

# **EXHIBIT 2**

UNITED STATES SOUTHERN DISTRICT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
GRAHAM CHASE ROBINSON,

Plaintiff,

-against-

Case No:  
1:19-cv-09156 (LTS) (KHP)

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.  
-----X

DEPOSITION TAKEN VIA ZOOM

December 20, 2021  
10:00 a.m.

DEPOSITION of GRAHAM CHASE ROBINSON, the  
Plaintiff herein, taken by the Defendants, pursuant to  
Article 31 of the Civil Practice Law & Rules of  
Testimony, and Court Order, held at the above-mentioned  
time, before, PAIGE HAYDEN, a Court Reporter and Notary  
Public of the State of New York.

-----X

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## 1 APPEARANCES:

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 New York, New York 10019

4 BY: ALEXANDRA HARWIN, ESQ.

6 TRAUB LIEBERMAN

Attorneys for Defendant  
 7 Seven Skyline Drive  
 HAWTHORNE, NEW YORK 10532

8 BY: GREGORY BENNETT, ESQ.

10 TARTER KRINSKY & DROGIN LLP

Attorneys for Defendant  
 11 1350 Broadway  
 New York, New York 10018

12 BY: LAURENT DROGIN, ESQ.

13 ALSO PRESENT:

14 KATE MACMULLIN, SANFORD HEISLER SHARP, LLP  
 ANNIE SLOAN, SANFORD HEISLER SHARP, LLP  
 DAVID SANFORD, SANFORD HEISLER SHARP, LLP

15 BRITTANY K. LAZZARO, TARTER KRINSKY & DROGIN LLP  
 16 TOM HARVEY

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## 1 FEDERAL STIPULATIONS:

2  
 3  
 4 IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE  
 5 ATTORNEYS FOR THE RESPECTIVE PARTIES HEREIN, THAT FILING  
 6 AND SEALING BE AND THE SAME ARE HEREBY WAIVED.

7  
 8 IT IS FURTHER STIPULATED AND AGREED THAT ALL OBJECTIONS,  
 9 EXCEPT AS TO FORM OF THE QUESTION, SHALL BE RESERVED TO  
 10 THE TIME OF THE TRIAL.

11  
 12 IT IS FURTHER STIPULATED AND AGREED THAT THE WITHIN  
 13 DEPOSITION MAY BE SWORN TO AND SIGNED BEFORE ANY OFFICER  
 14 AUTHORIZED TO ADMINISTER AN OATH, WITH THE SAME FORCE  
 15 AND EFFECT AS IF SIGNED AND SWORN TO BEFORE THIS COURT.

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1 GRAHAM CHASE ROBINSON, the WITNESS  
 2 herein, having been first duly sworn by  
 3 a Notary Public of the State of New  
 4 York, was examined and testified as  
 5 follows:

6 EXAMINATION BY  
 7 MR. DROGIN:

8 Q. State your name for the  
 9 record, please.

10 A. Graham Chase Robinson.

11 Q. State your address for the  
 12 record, please.

13 A. [REDACTED]

14 MR. DROGIN: Paige, can  
 15 you read into the record the  
 16 Federal Stipulations?

17 THE COURT REPORTER: It  
 18 is hereby stipulated and  
 19 agreed by and between the  
 20 attorneys for the respective  
 21 parties herein, that filing  
 22 and sealing be and the same  
 23 are hereby waived.

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## 1 G. C. ROBINSON

2 It is hereby stipulated  
 3 and agreed that all  
 4 objections, except as to form  
 5 of the question, shall be  
 6 reserved to the time of the  
 7 trial.

8 It is hereby stipulated  
 9 and agreed that the within  
 10 deposition may be sworn to  
 11 and signed before any officer  
 12 authorized to administer an  
 13 oath, with the same force and  
 14 effect as if signed and sworn  
 15 to before this Court.

16 MR. DROGIN: I am  
 17 prepared to so stipulate.

18 MS. HARWIN: Yes, that is  
 19 fine.

20 MR. BENNETT: As am I.  
 21 Just to put it on the record,  
 22 we are obviously proceeding  
 23 under the terms of the  
 24 stipulation that the Court  
 25 has entered into with respect

2 (Pages 2 to 5)

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1 G. C. ROBINSON  
 2 to remote depositions.  
 3 Q. Good morning, Chase.  
 4 A. Good morning.  
 5 Q. How long have you lived at  
 6 the address where you are -- where  
 7 you are currently at?  
 8 MS. HARWIN: Objection to  
 9 the form.  
 10 MR. DROGIN: How would  
 11 you like me to rephrase it?  
 12 MS. HARWIN: Ask how long  
 13 she lived at her residential  
 14 address?  
 15 MR. DROGIN: I will adopt  
 16 your attorney's question.  
 17 A. This is my family home that  
 18 I grew up in. I live with my  
 19 mother.  
 20 Q. How long have you lived  
 21 with your mother?  
 22 A. I can't recall how many  
 23 years I have lived with her. This  
 24 is my childhood home so --  
 25 Q. Okay.

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1 G. C. ROBINSON  
 2 And during the period of  
 3 time from when you were growing up,  
 4 until now, has anyone else resided  
 5 with you on a more or less permanent  
 6 basis?  
 7 A. On a permanent basis, no.  
 8 Q. Have you ever had your  
 9 deposition taken before?  
 10 A. No.  
 11 Q. Have you ever previously  
 12 attended a deposition either  
 13 remotely or in person?  
 14 A. No.  
 15 Q. Alright.  
 16 So the way that we are  
 17 going to proceed is just as you have  
 18 been doing. It is a  
 19 question-and-answer format.  
 20 It is very important that  
 21 you listen to the whole question.  
 22 Often you may be able to anticipate  
 23 where I am going, and sometimes you  
 24 may be right, sometimes you may be  
 25 wrong. But to ensure that you are

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1 G. C. ROBINSON  
 2 truly and actually answering the  
 3 question that I am asking, it is  
 4 important that you listen to the  
 5 whole question.  
 6 Is that understood?  
 7 A. Yes.  
 8 Q. It is also important since  
 9 we are not videotaping that you give  
 10 verbal answers to my questions.  
 11 Is that understood?  
 12 A. Yes.  
 13 Q. If you want to speak with  
 14 any of the four attorneys you have  
 15 got here, that is fine. However,  
 16 you need to answer the question  
 17 first, and then just let us know  
 18 that you want to speak with counsel  
 19 and we will take a break.  
 20 Is that understood?  
 21 A. Yes.  
 22 Q. It is also important that  
 23 you tell me if there are any words  
 24 that I use that you don't  
 25 understand.

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1 G. C. ROBINSON  
 2 Is that understood?  
 3 MS. HARWIN: Objection.  
 4 It is not her job to rephrase  
 5 or identify errors in your  
 6 questioning.  
 7 MR. DROGIN: Are you  
 8 objecting to something other  
 9 than the form of the  
 10 question?  
 11 MS. HARWIN: I am  
 12 objecting to the instruction.  
 13 MR. DROGIN: We just not  
 14 five minutes in and we  
 15 already agreed and stipulated  
 16 that all objections other  
 17 than the form are not  
 18 permitted. I ask that you  
 19 withdraw your objection.  
 20 MS. HARWIN: I made the  
 21 objection. You can continue.  
 22 MR. DROGIN: So you are  
 23 going to stand on your  
 24 objection?  
 25 MS. HARWIN: Yes.

3 (Pages 6 to 9)

G. C. ROBINSON

MR. DROGIN: Okay.

Q. If there is a word that you don't understand, will you tell me?

MS. HARWIN: Objection to the form.

Q. You can answer.

A. Yes, I will try to.

Q. Alright.

If you need me to repeat the question, just let me know, and either I will or I will ask the court reporter to read it back.

Is that okay?

A. Yes.

Q. If you answer the question that I have asked, I am going to make the assumption that you heard the question, you understood the question, and you are answering that question.

Is that understood?

A. Yes.

Q. Please take your time in answering my questions. While we

G. C. ROBINSON

are under some time restraint, I would rather get right answers than quick answers that you might want to change later.

Do you agree to answer to the best of your ability?

A. Yes.

Q. We are going to be talking about events that happened, on many occasions, many years ago. It is perfectly alright to tell me if you don't know or you don't remember.

Is that understood?

A. Yes.

Q. It is important that you don't guess.

Is that understood?

A. Yes.

Q. So when you answer a question, I am going to assume that you answer to the full extent and best of your ability.

Is that understood?

A. That is understood.

G. C. ROBINSON

Q. Are you currently alone where you are right now?

A. Yes.

Q. Do you understand that during this deposition while you are being questioned no else is to be present?

A. Yes.

Q. And do you understand that while you are being questioned, you are not to have any communications with anyone either by text, or e-mail, or other means of electronic communication?

A. Yes.

Q. Is there any reason why you can't proceed under the instructions that we have just been discussing for the past few minutes?

A. Not that I am aware of.

Q. Are you currently taking any medication that would impair your ability to hear my questions?

A. No, not that I am aware of.

G. C. ROBINSON

Q. Okay.

Are you currently under any medications that would impair your ability to answer my questions?

A. No, not that I am aware of.

Q. And before we began, you raised your right hand and you swore to tell the truth. Correct?

A. Yes.

Q. What does that oath mean to you?

MS. HARWIN: Objection to the form.

Q. Does that oath have a meaning to you?

MS. HARWIN: Objection to the form.

A. The oath means to tell the truth.

Q. Will you agree to tell the truth, even if the answer may be damaging to your case?

MS. HARWIN: Objection to the form.

Page 14

G. C. ROBINSON

A. Yes.

Q.

MS. HARWIN:

Page 15

G. C. ROBINSON

Page 16

G. C. ROBINSON

MR. DROGIN: I am prepared to stipulate that you have a standing objection to the form of every question that I ask. Is that okay?

MS. HARWIN: I think it makes sense for me to object to the specific question.

MR. DROGIN: You don't have to. I am telling you that in order to save time, I am willing to stipulate that you have a standing to the form of every single questions that I ask today. How is that?

MS. HARWIN: We will consider that and address it during the next time we return from a break.

MR. DROGIN: I am going to make it easy for you.

Page 17

G. C. ROBINSON

There is obviously a delay and I know that is not what you are trying to do.

MS. HARWIN: I appreciate that. We will consider that.

MR. DROGIN: You will revert back, I imagine, today?

MS. HARWIN: Yes.

5 (Pages 14 to 17)

G. C. ROBINSON

You worked for Canal for about 11 years, is that right?

G. C. ROBINSON

A. A little over 11 years.  
 Q. And who hired you?  
 A. Bob and Lauren Hertz (ph), I guess.  
 Q. Okay.  
 And just -- I think it will make it easier, you mean -- when you say, "Bob," you mean Robert De Niro?  
 A. Yes.  
 Q. So Bob was involved in your hiring, is that correct?  
 A. Yes.  
 Q. And Bob promoted you during your employment?  
 A. Yes.  
 Q. How many times did Bob promote you during your employment?  
 A. He gave me two titles during my employment.  
 Q. Other than title change, were those promotions?  
 MS. HARWIN: Objection to the form.  
 MR. DROGIN: I will

G. C. ROBINSON

rephrase it.  
 Q. When your titled changed, did your duties and responsibilities change as well?  
 MS. HARWIN: Objection to the form.  
 MR. DROGIN: How would you rephrase that question so it wouldn't draw an objection?  
 MS. HARWIN: I would specify which positions you are referring to.  
 MR. DROGIN: I am referring to the two that she is talking about.  
 Q. Are you able to answer the question with that clarification?  
 A. The majority of my job did not change with the two title changes.  
 Q. Okay.  
 And did your duties and responsibilities increase over time

G. C. ROBINSON

over that 11 years?  
 MS. HARWIN: Objection to the form.  
 Q. You can answer.  
 A. There -- there were certain tasks or jobs that I did here and there, but the majority of my job had remained the same.  
 Q. Over the entire 11-year period?  
 A. Over the -- I would say so, yes.  
 Q. And you received salary increases over the years, is that correct?  
 A. Yes.  
 Q. Do you remember how many salary increases you received?  
 A. No, I don't.  
 Q. Do you recall whether Bob was involved in giving you those salary increases?  
 A. Yes, he was.  
 Q. Is it fair to say that Bob

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1 G. C. ROBINSON  
 2 came to rely on you to handle many  
 3 things about his life?  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 Q. When she objects to the  
 7 form, you can answer it.  
 8 A. I think that there are -- I  
 9 think there were, like many  
 10 employees, things that Bob had asked  
 11 -- many of the things he had asked  
 12 me had to do with his potential  
 13 life, his domestic life, items that  
 14 were personal in nature or items  
 15 that dealt with his ex-girlfriend,  
 16 Toukie Smith or his kids.  
 17 Q. Okay.  
 18 I am going to come back to  
 19 my question.  
 20 In performing your duties  
 21 for Canal, however, is it fair to  
 22 say that he would rely on you, in  
 23 your role as a Canal employee, to do  
 24 certain things for him and the  
 25 company?

Page 24

1 G. C. ROBINSON  
 2 Q. So is it fair to say over  
 3 time you came to know his likes and  
 4 dislikes?  
 5 MS. HARWIN: Objection to  
 6 the form.  
 7 Q. Not about everything under  
 8 the universe, but in general?  
 9 MS. HARWIN: Objection to  
 10 the form.  
 11 A. Like many of the employees,  
 12 I came to know what his needs were.  
 13 Q. I am not asking about  
 14 needs. I am asking about likes and  
 15 dislikes. Certain things that he  
 16 liked and didn't like, and you  
 17 became aware of them. Is that  
 18 correct?  
 19 MS. HARWIN: Objection to  
 20 the form.  
 21 A. I became aware of the --  
 22 some of the things that he liked and  
 23 didn't like during my time in Canal.  
 24 Q. Did you come to an  
 25 understanding as to some of the

Page 23

1 G. C. ROBINSON  
 2 MS. HARWIN: Objection to  
 3 the form.  
 4 A. I believe that is a core  
 5 job of all Canal employees.  
 6 Q. What is?  
 7 A. To do what Bob asked.  
 8 Q. Okay.  
 9 And again, I am going to  
 10 come back to my question.  
 11 Does that mean that he  
 12 relied on you to do what he asked?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. I believe he relied on me  
 16 as he did other employees to do what  
 17 he asked.  
 18 Q. As time went on, as you  
 19 indicated, you learned a great deal  
 20 about his personal life, is that  
 21 correct?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. Like many employees, yes, I  
 25 did.

Page 25

1 G. C. ROBINSON  
 2 things that may make him happy or  
 3 upset him?  
 4 A. Can you repeat the  
 5 question?  
 6 MR. DROGIN: Can you read  
 7 it back?  
 8 (Whereupon, the requested  
 9 portion was read back by the  
 10 reporter:  
 11 Q: Did you come to an  
 12 understanding as to some of  
 13 the things that may make him  
 14 happy or upset him?)  
 15 A. Yes.  
 16 Q. Did you feel that over time  
 17 you got to know how to read his  
 18 mood, what kind of mood he was in?  
 19 MS. HARWIN: Objection to  
 20 the form.  
 21 MR. DROGIN: What is  
 22 wrong with the form of the  
 23 question?  
 24 MS. HARWIN: It is vague  
 25 and ambiguous.

7 (Pages 22 to 25)



1 G. C. ROBINSON  
2 Q. You can answer unless you  
3 don't understand the question. You  
4 told me that you would tell me if  
5 you don't understand the question,  
6 right? You will tell me if you  
7 don't understand the question, is  
8 that fair?

9 A. Yes, I said I would try.

10 MR. DROGIN: I will  
11 rephrase the question.

12 Q. Over time, is it fair to  
13 say that you learned how to read his  
14 mood?

15 MS. HARWIN: Objection to  
16 the form.

17 A. I think at times you could  
18 understand his mood. He was at  
19 times quite verbal about his likes  
20 and dislikes.

21 Q. And you -- is it fair to  
22 say that you knew a great deal about  
23 not -- a great deal of nonpublic  
24 information about him, is that  
25 correct?

1 G. C. ROBINSON

2 MS. HARWIN: Objection to  
3 the form.

4 A. I became aware of  
5 information like other Canal  
6 employees that was not common  
7 knowledge or in public.

8 Q. So for example, health  
9 issues that he had, correct, that is  
10 one thing?

11 MS. HARWIN: Objection to  
12 the form.

13 A. Yes, I believe there were  
14 some that weren't --

15 Q. And you became privy to  
16 certain marital issues that he was  
17 having over this 11-year period, is  
18 that fair?

19 A. Yes, some of the ones that  
20 weren't public. Others that were.

21 Q. Is it also fair to say that  
22 there were ups and downs in your  
23 relationship with Bob?

24 MS. HARWIN: Objection to  
25 the form.

1 G. C. ROBINSON

2 A. I think that there were  
3 times that he was incredibly abusive  
4 and it was very difficult to work at  
5 Canal Productions. There were other  
6 times where he would try to erase  
7 what he had done, whether it was  
8 berating me or the abuse of trying  
9 to do something sweet or nice. So  
10 there were many ups and downs during  
11 my time at Canal. Many of them were  
12 -- were down.

13 Q. And you -- is it fair to  
14 say that you went through some good  
15 times in his life together?

16 MS. HARWIN: Objection to  
17 the form.

18 A. I think there were time  
19 that were better than others.

20 Q. Okay.

21 Was he a father figure to  
22 you?

23 MS. HARWIN: Objection to  
24 the form.

25 A. I had used that term at

1 G. C. ROBINSON

2 times to offset other thoughts of  
3 what people would think.

4 Q. Okay.

5 So you admit then that you  
6 told people, on occasion, that he  
7 was like a father or father figure  
8 to you, isn't that right?

9 MS. HARWIN: Objection to  
10 the form.

11 A. I said that to offset the  
12 thoughts of anything else for  
13 specific reasons.

14 Q. So the answer to my  
15 question is yes, you did tell people  
16 that?

17 MS. HARWIN: Objection to  
18 the form.

19 A. Yes, to offset other  
20 thoughts that people might have.

21 Q. So you were lying to these  
22 other people, is that what you are  
23 saying?

24 MS. HARWIN: Objection to  
25 the form.

1 G. C. ROBINSON  
2 Q. Can you answer the  
3 question?  
4 A. No, I wasn't -- I wasn't.  
5 I was trying to, again, offset  
6 thoughts of any -- of people  
7 thinking anything else.  
8 Specifically, things that were said  
9 -- because of things that were said  
10 to me.  
11 Q. So when you told people  
12 that he was like a father figure to  
13 you, what did you mean?  
14 MS. HARWIN: Objection to  
15 the form.  
16 A. That that is the way that I  
17 saw him, that there wasn't anything  
18 else.  
19 Q. So you saw him as a father  
20 figure?  
21 MS. HARWIN: Objection to  
22 the form.  
23 A. At times.  
24 Q. Let's go to the summer of  
25 2018. Bob was in California. Is

1 G. C. ROBINSON  
2 that correct?  
3 A. I'm sorry, you broke up for  
4 a second. Can you repeat that?  
5 Q. Sure. I want to go to the  
6 summer of 2018.  
7 Am I correct Bob was in  
8 California?  
9 [REDACTED]  
10 [REDACTED]  
11 Q. [REDACTED]  
12 A. Yes. I -- yes. Yes, [REDACTED]  
13 [REDACTED].  
14 Q. At that time he was  
15 [REDACTED]  
16 [REDACTED]  
17 MS. HARWIN: Objection to  
18 the form.  
19 Q. During the summer of 2018,  
20 [REDACTED]  
21 [REDACTED]  
22 A. No, I don't believe it was  
23 at that time, during the summer. He  
24 was at [REDACTED]  
25 Q. Okay.

1 G. C. ROBINSON  
2 Had it been -- was he going  
3 through [REDACTED] at that  
4 time over the summer of 2018?  
5 A. No.  
6 Q. When did [REDACTED]  
7 [REDACTED]  
8 start, if you remember?  
9 A. [REDACTED]  
10 [REDACTED]  
11 [REDACTED].  
12 Q. Of 2018?  
13 A. 2018, yes.  
14 Q. Did you have a sense of how  
15 [REDACTED]  
16 [REDACTED]  
17 MS. HARWIN: Objection to  
18 the form.  
19 A. I don't think there is  
20 anything -- it is speculation. I  
21 can't speculate.  
22 Q. When he came back to New  
23 York, from California, did you  
24 notice that there were changes in  
25 his behavior?

1 G. C. ROBINSON  
2 MS. HARWIN: Objection to  
3 the form.  
4 A. I can't really recall if  
5 there were changes in his behavior  
6 at that time.  
7 Q. Did there come a time after  
8 he returned to New York that you  
9 began to notice changes in his  
10 behavior?  
11 MS. HARWIN: Objection to  
12 the form.  
13 A. Not that I can recall.  
14 MR. DROGIN: I'm sure you  
15 are probably objecting to 97  
16 percent of my questions. You  
17 want to revisit -- you want  
18 to take a break and revisit  
19 my offer to take a standing  
20 objection to all of my  
21 questions?  
22 MS. HARWIN: Sure. We  
23 can take a five-minute break.  
24 (Whereupon, a recess was  
25 taken at this time.)

1 G. C. ROBINSON  
 2 MR. DROGIN: Ms. Harwin,  
 3 I offered you a stipulation  
 4 where you could have a  
 5 standing objection to the  
 6 form for every single  
 7 question that I was asking.  
 8 MS. HARWIN: Yes,  
 9 Plaintiff will -- we will  
 10 stipulate that Plaintiff has  
 11 a standing objection to form  
 12 of all questions posed in the  
 13 deposition.  
 14 MR. DROGIN: And that is,  
 15 I mean, obviously for me.  
 16 When Mr. Bennett is  
 17 questioning, we will see how  
 18 he does and if his questions  
 19 draw so many objections.  
 20 MS. HARWIN: Plaintiff  
 21 stipulates that Plaintiff --  
 22 the parties stipulate that  
 23 Plaintiff has a standing  
 24 objection to the form of all  
 25 questions posed by Mr. Drogin

1 G. C. ROBINSON  
 2 during the deposition.  
 3 Q. When Bob returned from  
 4 California, isn't it true that he  
 5 needed a place to live?  
 6 A. Yes.  
 7 Q. When was it he returned,  
 8 about, if you don't know the exact  
 9 date?  
 10 A. I don't recall.  
 11 Q. It was sometime before  
 12 November 20th, 2018?  
 13 A. Yes.  
 14 Q. Did he -- when he came  
 15 back, he was renting a house in the  
 16 Hamptons, isn't that right?  
 17 A. I can't recall.  
 18 Q. Okay.  
 19 Was there a time when he  
 20 was also living in a hotel?  
 21 A. Yes.  
 22 Q. Around what period of time  
 23 was that?  
 24 A. Around July, August,  
 25 September, October, November. He

1 G. C. ROBINSON  
 2 came back during the time that he  
 3 was [REDACTED]  
 4 [REDACTED]  
 5 Q. And he would stay in a  
 6 hotel?  
 7 A. Yes.  
 8 Q. Are you familiar with a  
 9 property known as [REDACTED]  
 10 A. Yes.  
 11 Q. What was [REDACTED]  
 12 A. [REDACTED] was  
 13 Bob's rental townhouse that he moved  
 14 into.  
 15 Q. When did he move in?  
 16 A. I can't recall when he  
 17 moved in. It was, I believe, end of  
 18 October, beginning of November.  
 19 Q. This being 2018?  
 20 A. Yes.  
 21 Q. Before he moved in, the  
 22 townhouse needed to be furnished, is  
 23 that correct?  
 24 A. Yes, all four stories.  
 25 Q. And it needed furniture for

1 G. C. ROBINSON  
 2 all four stories, correct?  
 3 A. Yes.  
 4 Q. It needed rugs or flooring,  
 5 is that right?  
 6 A. Yes.  
 7 Q. It needed artwork, correct?  
 8 A. Yes.  
 9 Q. And it needed other  
 10 necessities, even down to like  
 11 vacuum cleaners, is that right?  
 12 A. Yes.  
 13 Q. And am I correct that Canal  
 14 employees were used to assist in the  
 15 furnishing of [REDACTED]  
 16 A. Some employees were. Bob  
 17 had asked me to help him design it.  
 18 Q. When you say, "design it,"  
 19 what do you mean?  
 20 A. Figure out layouts for the  
 21 rooms, source fabrics, send him  
 22 options for all the different items  
 23 that one would put in a house,  
 24 whether it was plates, glasses,  
 25 fabric for couches, couches,

1 G. C. ROBINSON  
 2 antiques things, all along the lines  
 3 of that.  
 4 Q. And which other Canal  
 5 employees assisted with the  
 6 furnishing of [REDACTED]  
 7 A. Sabrina Weeks-Britan and Lu  
 8 Lu White.  
 9 Q. Who is Sabrina?  
 10 A. Sabrina was Bob's -- one of  
 11 Bob's executive assistants.  
 12 Q. And who was Lu Lu?  
 13 A. Lu Lu White was an  
 14 assistant -- was supposed to be an  
 15 assistant to me and the office, but  
 16 her job surrounded more of the [REDACTED]  
 17 apartment then.  
 18 Q. And the [REDACTED] apartment,  
 19 when did that start?  
 20 A. I believe the lease began  
 21 on August 1st of 2018.  
 22 Q. And the best -- your best  
 23 recollection is he moved in around  
 24 the fall of 2018, is that right?  
 25 A. Yes. The four-story

1 G. C. ROBINSON  
 2 townhouse needed to be furnished.  
 3 Q. And after it was furnished,  
 4 did he move in?  
 5 A. I wouldn't characterize it  
 6 that way.  
 7 Q. Alright.  
 8 How would you characterize  
 9 it?  
 10 A. He moved in while it was  
 11 still in process -- in the process  
 12 of furnishing.  
 13 Q. So while this was in  
 14 process, did your duties and  
 15 responsibilities relating to [REDACTED]  
 16 continue?  
 17 A. Yes.  
 18 Q. Was that true for the other  
 19 Canal employees who were pitching  
 20 in?  
 21 A. Some of them. Lu Lu White.  
 22 Lu Lu White did.  
 23 Q. What about Sabrina?  
 24 A. She only had, I believe, a  
 25 little involvement in the beginning.

1 G. C. ROBINSON  
 2 Q. What about Michael Tasch,  
 3 T-A-S-C-H?  
 4 A. Can you specify or rephrase  
 5 on what you are asking?  
 6 Q. Sure.  
 7 How, if at all, was Michael  
 8 Tasch involved with the operation to  
 9 get [REDACTED] furnished for Bob?  
 10 A. Other than paying some of  
 11 the bills, or checks for the  
 12 furnishing, I can't recall how else  
 13 he would have had involvement.  
 14 Q. What about Tom Harvey?  
 15 A. (No verbal response.)  
 16 Q. I'm sorry. Did you answer  
 17 the question?  
 18 A. Tom Harvey had helped  
 19 during the rental process and the  
 20 lease, but in terms of the actual  
 21 furnishing I can't recall him having  
 22 --  
 23 Q. What about Michael Kaplan  
 24 (ph)?  
 25 A. Michael Kaplan was not

1 G. C. ROBINSON  
 2 involved in the furnishing, more in  
 3 the maintenance of things that  
 4 needed to be fixed.  
 5 Q. Was Lu Lu involved in the  
 6 maintenance of things that needed to  
 7 be fixed, like Michael Kaplan?  
 8 A. No. More in the design and  
 9 the items -- other items for the  
 10 apartment.  
 11 Q. What about Sabrina?  
 12 A. As I said, she only had a  
 13 small role in the beginning.  
 14 Q. Okay.  
 15 Were there any household or  
 16 domestic employees who assisted at  
 17 that time with [REDACTED]  
 18 A. There was only -- for  
 19 domestic employees, there was only a  
 20 housekeeper, but not with the design  
 21 of [REDACTED].  
 22 Q. But anybody else --  
 23 forgetting the design, was the  
 24 housekeeper involved in some of the  
 25 things that needed to be done to get

1 G. C. ROBINSON  
 2 it set up so he could move in?  
 3 A. The housekeeper cleaned.  
 4 Q. Alright.  
 5 Did Bob ask you to assist  
 6 in this process with [REDACTED]  
 7 A. Yes. He specifically asked  
 8 me to help him design and design it  
 9 with him.  
 10 Q. Did you agree?  
 11 A. I objected to want to go  
 12 work on it.  
 13 Q. But eventually, not  
 14 withstanding your objection, you did  
 15 do it, correct?  
 16 A. Yes, I had to.  
 17 Q. Did you do it as a favor to  
 18 him?  
 19 A. No.  
 20 Q. Were you trying to help  
 21 him?  
 22 A. I was asked to do it as one  
 23 of my job duties.  
 24 Q. And are you saying that you  
 25 did it against your will?

1 G. C. ROBINSON  
 2 A. I had made objections on  
 3 multiple occasions of not wanting to  
 4 be involved in the [REDACTED] project. It  
 5 was his domestic life, and it wasn't  
 6 any job under the title that went  
 7 with the title VP of production and  
 8 finance.  
 9 Q. So this was separate and  
 10 apart -- what he was asking you to  
 11 do was separate and apart from your  
 12 ordinary duty, is that right?  
 13 A. It had nothing to do with  
 14 my duties as VP of production of  
 15 finance, but it was something that  
 16 he had redirected me to do instead  
 17 of other work. It was -- he  
 18 prioritized it.  
 19 Q. Is it fair to say that that  
 20 increased your work load?  
 21 A. It became a majority of my  
 22 work load.  
 23 Q. Who is Tiffany Chen (ph)?  
 24 A. The woman that [REDACTED]  
 25 [REDACTED] and now his,

1 G. C. ROBINSON  
 2 I believe, current girlfriend.  
 3 Q. When was the first time  
 4 that you met Tiffany?  
 5 A. During the films of The  
 6 Intern, and I believe that was 2014.  
 7 Q. And to your knowledge, when  
 8 did their relationship begin?  
 9 [REDACTED]  
 10 [REDACTED],  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 Q. So is it fair to say that  
 16 you met her before the summer of  
 17 2018?  
 18 A. Yes, I believe on one  
 19 occasion.  
 20 Q. And before the summer of  
 21 2018, had you interacted with her  
 22 with any regularity?  
 23 A. No.  
 24 Q. When Bob returned to New  
 25 York, from California, is that a

1 G. C. ROBINSON  
 2 period of time when you considered  
 3 her to be his girlfriend?  
 4 A. I don't think I would  
 5 characterize it that way.  
 6 Q. Okay.  
 7 How would you characterize  
 8 it?  
 9 A. That it was [REDACTED]  
 10 [REDACTED].  
 11 Q. Was it your understanding  
 12 that they were going to live  
 13 together in [REDACTED]?  
 14 A. In the beginning -- the  
 15 very beginning after I met her, that  
 16 was not something that I was aware  
 17 of.  
 18 Q. Did there come a time where  
 19 you became aware that she was going  
 20 to move into [REDACTED]  
 21 A. I can't recall exactly when  
 22 I became aware of that. For a  
 23 couple of months [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 G. C. ROBINSON  
 2 [REDACTED], so I can't recall  
 3 exactly when she -- I knew she was  
 4 moving in.  
 5 Q. I'm sorry, you did know she  
 6 was moving in?  
 7 A. I can't recall when.  
 8 Q. Okay.  
 9 And she had, at one point,  
 10 claimed there was a mold problem in  
 11 [REDACTED], is that right?  
 12 A. Yes.  
 13 Q. And this was an issue that  
 14 consumed a lot of your time, is that  
 15 fair?  
 16 A. It consumed a bit of my  
 17 time, in addition to Tom Harvey and  
 18 Michael Tasch's as well.  
 19 Q. [REDACTED]  
 20 [REDACTED]  
 21 A. [REDACTED]  
 22 Q. She insisted there was mold  
 23 in [REDACTED]  
 24 A. Yes.  
 25 Q. And there were all sorts of

1 G. C. ROBINSON  
 2 testing being done to show there was  
 3 no mold in [REDACTED], right?  
 4 A. There were tests that were  
 5 done in [REDACTED], in 2019, that Michael  
 6 Tasch and Tom Harvey were involved  
 7 in as well.  
 8 Q. When Bob got back from  
 9 California, do you recall him being  
 10 very uptight?  
 11 A. No, I don't recall that.  
 12 Q. Had he been -- when he came  
 13 back from California, was he  
 14 screaming at you more regularly than  
 15 he had been in recent years?  
 16 A. In 2019, it had gotten --  
 17 his behavior and his berating had  
 18 gotten worse.  
 19 Q. This would have been after  
 20 he had announced [REDACTED]  
 21 [REDACTED]?  
 22 [REDACTED].  
 23 I don't recall when they announced  
 24 they were divorced.  
 25 Q. Did this also happen over

1 G. C. ROBINSON  
 2 the period of time that you and  
 3 others were dealing with the  
 4 supposed mold issue in [REDACTED]  
 5 A. Can you clarify? Are you  
 6 asking his behavior?  
 7 Q. Yes. The screaming and  
 8 berating, as you described it, was  
 9 that all happening around the same  
 10 time?  
 11 A. It was happening --  
 12 happening prior to the mold  
 13 situation.  
 14 Q. And also during the mold  
 15 situation?  
 16 A. It got worse and more  
 17 abusive during the mold situation.  
 18 But his behavior in yelling, and  
 19 screaming, and berating was pretty  
 20 consistent through my employment at  
 21 Canal.  
 22 Q. So there wasn't, let's say  
 23 a period of time, several years  
 24 perhaps, where he really hadn't been  
 25 yelling or berating you -- let me

1 G. C. ROBINSON  
 2 rephrase it.  
 3 Are you saying that his  
 4 yelling and berating at you occurred  
 5 throughout the entire time that you  
 6 worked for Canal?  
 7 A. It -- it varied at times,  
 8 but he was [REDACTED]  
 9 [REDACTED] berating, and yelling,  
 10 but this was depending on the year.  
 11 It was pretty consistent.  
 12 Q. So there was some years  
 13 where it was less and some years  
 14 where it was more?  
 15 A. I don't know. I can't -- I  
 16 worked at Canal for over a decade.  
 17 Q. You turned over multiple  
 18 audio recordings that you made in  
 19 this case. Are you aware of that?  
 20 I should say your attorneys turned  
 21 over.  
 22 A. Yes, I am aware of that.  
 23 Q. Do you know how many audio  
 24 recordings were actually turned  
 25 over?

1 G. C. ROBINSON  
 2 A. I don't know.  
 3 Q. Do you have any  
 4 documentation that shows the dates  
 5 and times that the recordings were  
 6 made?  
 7 MS. HARWIN: I would just  
 8 note that obviously the  
 9 Plaintiff is not to provide  
 10 any attorney-client privilege  
 11 information.  
 12 MR. DROGIN: So noted.  
 13 A. Not that I am aware of.  
 14 Q. Okay.  
 15 Do you have any other audio  
 16 recordings that you have related to  
 17 your employment that you have not  
 18 turned over to your attorney?  
 19 A. Not that I am aware of.  
 20 Q. Do you have any video  
 21 recordings that have not been turned  
 22 over to your attorney that relate in  
 23 any way to your employment?  
 24 A. Not that I am aware of.  
 25 Q. Did you have any other

1 G. C. ROBINSON  
 2 audio recordings that you erased?  
 3 A. Are you talking about  
 4 during my whole entire time at  
 5 Canal, like a voicemail, or --  
 6 Q. No. Specifically I am  
 7 talking in connection with the audio  
 8 recordings, let's say that were made  
 9 in 2018 and 2019.  
 10 A. No.  
 11 Q. No, there were none that  
 12 you erased?  
 13 A. Yes, that is correct.  
 14 Q. Did you destroy any audio  
 15 recordings that you made during that  
 16 time period?  
 17 A. No, not that I am aware of.  
 18 Q. Do you know how many hours  
 19 of recordings you turned over to  
 20 your attorney -- attorneys, roughly?  
 21 A. I don't know. I can't  
 22 recall.  
 23 Q. During what period of time  
 24 were those recordings made?  
 25 A. I can't recall -- I can't

1 G. C. ROBINSON  
 2 recall exactly when they began. I  
 3 believe in March 2019.  
 4 Q. That is when you started  
 5 making these recordings?  
 6 A. I believe so, yes.  
 7 Q. And was there a time that  
 8 you stopped making the recordings?  
 9 A. I can't recall when I  
 10 stopped.  
 11 Q. But there did come a time  
 12 that you stopped making the  
 13 recordings?  
 14 A. There came a time that I  
 15 was not speaking to other Canal  
 16 Productions or people in connection  
 17 with Canal.  
 18 Q. So is it fair to say then  
 19 that you stopped recording them?  
 20 A. Yes.  
 21 Q. Why did you start making  
 22 these recordings?  
 23 A. I wanted some backup with  
 24 some of the items for the [REDACTED]  
 25 [REDACTED], Bob's

1 G. C. ROBINSON  
 2 townhouse.  
 3 Q. Okay.  
 4 What do you mean by that?  
 5 A. Some of the work that was  
 6 being done, decisions that were  
 7 being made, issues with the  
 8 apartment that had absolutely  
 9 nothing to do with -- with my job.  
 10 Q. Why did you feel it was  
 11 necessary to document this?  
 12 A. I felt that I needed a  
 13 backup, in addition to speaking to  
 14 Tom Harvey and Michael Tasch about  
 15 apartment issues.  
 16 Q. Were these all phone calls  
 17 that you were recording?  
 18 A. Yes, I believe so.  
 19 Q. And how did you record  
 20 them?  
 21 A. I -- from what I can  
 22 recall, the phone was on speaker and  
 23 I used the -- I don't know what app  
 24 it is on the computer, but the Voice  
 25 app. There is an icon for it to



1 G. C. ROBINSON

2 record.

3 Q. So that was on the iPhone  
4 you recorded on speaker phone, is  
5 that what you said?

6 A. I recorded with the phone  
7 on speaker phone, and recorded in on  
8 an app on my computer that recorded  
9 it.

10 Q. Alright.

11 And were you always in New  
12 York when you recorded this -- these  
13 calls?

14 A. I believe that -- I can't  
15 recall. I believe I was in New  
16 York.

17 Q. Okay.

18 Did you ever record any of  
19 these calls when you were in Spain?

20 A. Yes, after I left Canal  
21 Productions, I believe there was one  
22 in Spain.

23 MS. HARWIN: If there is  
24 a good time for a bathroom  
25 break, I would appreciate it.

1 G. C. ROBINSON

2 MR. DROGIN: Sure. Give  
3 me two minutes.

4 Q. And did you record all of  
5 your calls with these Canal  
6 employees or just some?

7 A. I didn't record all of my  
8 conversations with Canal employees.

9 Q. How did you go about  
10 deciding which ones to record and  
11 which ones not to record?

12 A. I think that there were  
13 probably factors including what the  
14 topic was going to be, if it was  
15 about the apartment. But I can't  
16 recall any other decisions on why.

17 Q. So am I correct that these  
18 were all calls that you initiated as  
19 opposed to calls that you received?

20 A. I wouldn't say that that is  
21 correct, but I can't recall whether  
22 somebody called me or I called them.

23 Q. Okay.

24 Did you record any of these  
25 calls while you were in California?

1 G. C. ROBINSON

2 A. I can't recall a specific  
3 -- a specific one that was in  
4 California.

5 Q. But you may have?

6 A. I don't know. I don't want  
7 to guess.

8 Q. Okay.

9 Does your iPhone store the  
10 location as where it is?

11 A. No. Not that I am aware  
12 of.

13 Q. Alright.

14 Some of the recordings that  
15 you made were while you were still  
16 employed, is that correct?

17 A. Yes.

18 Q. And while you were making  
19 these recordings, was that working  
20 time?

21 A. Can you clarify? I mean, I  
22 was working.

23 Q. So -- at the time --  
24 withdrawn.

25 So some of these calls that

1 G. C. ROBINSON

2 you made, where you were recording  
3 people, you were actually being paid  
4 by Canal, correct?

5 A. Yes. I mean -- yeah. That  
6 was part of discussing the work.

7 Q. At the time that you were  
8 recording these calls, had you told  
9 anyone that they were being  
10 recorded?

11 A. No, not that I believe.

12 Q. Is it a fair statement to  
13 say that to the best of your  
14 recollection none of the people with  
15 whom you were speaking were aware  
16 that you were recording their call?

17 A. I didn't discuss it with  
18 any of them.

19 Q. Do you have any reason to  
20 believe that any of the people that  
21 you were recording were aware that a  
22 recording was being made of your  
23 phone call with them?

24 A. I can't speculate about  
25 what they thought.



1 G. C. ROBINSON  
 2 Q. To the best of your  
 3 recollection?  
 4 A. I can't speculate what  
 5 somebody else thought.  
 6 Q. But as a general rule, you  
 7 didn't make people aware that they  
 8 were being recorded, isn't that  
 9 right?  
 10 A. Not that I am aware of.  
 11 MR. DROGIN: This is a  
 12 good time for that break that  
 13 you wanted.  
 14 MS. HARWIN: Thank you  
 15 very much. What time would  
 16 you like to come back on the  
 17 record?  
 18 MR. DROGIN: You tell me.  
 19 MS. HARWIN: Just five  
 20 minutes.  
 21 MR. DROGIN: That means  
 22 ten, right?  
 23 MS. HARWIN: I will try  
 24 to keep it under ten. Why  
 25 don't we say 11:30? That is

1 G. C. ROBINSON  
 2 eight minutes.  
 3 MR. DROGIN: So  
 4 stipulated.  
 5 (Whereupon, a recess was  
 6 taken at this time.)  
 7 Q. I want to make sure I  
 8 understood your testimony. When you  
 9 were making these recordings, are  
 10 you saying it was on an app on the  
 11 computer, or an app on your phone?  
 12 A. It is an app on my  
 13 computer. I think it is called  
 14 Voice.  
 15 Q. Okay.  
 16 And when you say, "my  
 17 computer," are you talking about a  
 18 personal computer or a computer that  
 19 you had through Canal?  
 20 A. A personal computer.  
 21 Q. And that -- that  
 22 information from your personal  
 23 computer has not been turned over to  
 24 your attorney or has it?  
 25 A. It has been.

1 G. C. ROBINSON  
 2 Q. Okay.  
 3 Have you ever told Robin  
 4 Chambers that you have recordings of  
 5 some of your calls with her?  
 6 A. Not that I can recall.  
 7 Q. And when you were having  
 8 these conversations that you  
 9 recorded, were you trying to be  
 10 honest?  
 11 A. Yes, of course.  
 12 Q. Okay.  
 13 So you weren't, for  
 14 example, trying to create a record  
 15 by saying things that might support  
 16 yourself if there was ever  
 17 litigation?  
 18 A. No.  
 19 Q. Sometimes would you  
 20 exaggerate?  
 21 A. Not that I am aware of.  
 22 Q. Is it fair to say that if  
 23 you stated an opinion on something  
 24 that was truly held by you, that  
 25 that was what you believed?

1 G. C. ROBINSON  
 2 A. Can you give me an example  
 3 or --  
 4 Q. If you stated an opinion,  
 5 for example, like there was an old  
 6 Bob and a new Bob. Is that  
 7 something that you said because you  
 8 believed it?  
 9 A. If it is something that I  
 10 said then -- I don't know what the  
 11 specific context of an old Bob and a  
 12 new Bob in that conversation was.  
 13 But it would be within that context  
 14 of whatever I was discussing.  
 15 Q. Okay.  
 16 But in other words, if you  
 17 were expressing your opinion about  
 18 something, it was truly what you  
 19 believed, is that fair?  
 20 A. In that moment.  
 21 Q. In that moment.  
 22 Are you familiar with the  
 23 phrase confidant?  
 24 A. Yes.  
 25 Q. The word confidant?

1 G. C. ROBINSON  
 2 A. Yes.  
 3 Q. What is a confidant?  
 4 A. Somebody that you confide  
 5 in.  
 6 Q. Did you confide in Robin?  
 7 A. Yes.  
 8 Q. Would you agree that Robin  
 9 was a confidant of yours?  
 10 A. I believe at times she was  
 11 the only person that I could speak  
 12 to about the issues that I was  
 13 facing and receive advice from.  
 14 When I was having issues or having  
 15 Bob berate me, I used to call her  
 16 crying.  
 17 Q. Did you value her advice?  
 18 A. Yes.  
 19 Q. Did you value her opinion?  
 20 A. At times, I did. Yes.  
 21 Q. Were there times that you  
 22 didn't value her opinion?  
 23 A. I mean, I can't recall  
 24 every conversation or every piece of  
 25 opinion she gave me.

1 G. C. ROBINSON  
 2 perception, did you believe his  
 3 judgment was impaired or being  
 4 impaired by Tiffany?  
 5 A. When he came back from  
 6 [REDACTED], I don't know.  
 7 Q. Was there subsequently a  
 8 point in time when you believe Bob's  
 9 judgment was being impaired by  
 10 Tiffany?  
 11 A. Can you clarify judgment or  
 12 what is -- can you rephrase it?  
 13 Q. Did there come a time where  
 14 you believed that Tiffany was having  
 15 an adverse impact on Bob?  
 16 A. Yes, I believe at times in  
 17 --  
 18 Q. In what way or in general  
 19 how?  
 20 A. I can't really recall any  
 21 specifics at this moment.  
 22 Q. Did you come to believe  
 23 that Tiffany was controlling Bob?  
 24 A. Controlling Bob, no. Not  
 25 that I can recall.

1 G. C. ROBINSON  
 2 Q. Do you recall ever telling  
 3 Robin that when Bob returned from  
 4 California he was in a "weakened  
 5 state?"  
 6 A. I don't recall specifically  
 7 saying that, but we had a lot of  
 8 conversations.  
 9 Q. Alright.  
 10 When Bob returned from  
 11 California, did you believe he was  
 12 in a weakened state?  
 13 A. [REDACTED]  
 14 [REDACTED] I think I would need to know  
 15 the context of that conversation.  
 16 [REDACTED]  
 17 [REDACTED].  
 18 Q. When he came back from  
 19 [REDACTED], did you believe that his  
 20 judgment was impaired because of  
 21 Tiffany?  
 22 A. I can't speculate on  
 23 whether his judgment was impaired by  
 24 Tiffany. His judgment was impaired.  
 25 Q. I am asking, from your

1 G. C. ROBINSON  
 2 Q. Now, you began to have  
 3 problems with Tiffany in 2018, is  
 4 that correct?  
 5 A. There were concerns in --  
 6 in 2018 and 2019. I felt that she  
 7 was really targeting me based on my  
 8 gender, giving me demeaning jobs,  
 9 having me do things for her for the  
 10 house.  
 11 Q. Okay.  
 12 When did this begin?  
 13 A. Which part of my answer is  
 14 it that you are --  
 15 Q. Any part of it.  
 16 When did this first sort of  
 17 hit your radar, so to speak, that  
 18 you began to have those problems  
 19 with her. I believe you used the  
 20 word targeting. When did you think  
 21 the targeting began?  
 22 A. I started to feel very  
 23 uncomfortable at times on some of  
 24 the items that she was texting me  
 25 and compliments that she was making.

G. C. ROBINSON

They seemed to be concerning is how I would probably phrase it especially when it came to items that she was gifting me. A pack of massages and told me how the man or the person there would massage me and what I had to wear. To me, it was crossing of line of business. And she was trying to make it more personal, which was concerning. And there were a lot of things that she was asking of me to help her facilitate in the apartment which were problematic.

Again, it wasn't part of my job as VP of production, but I found myself doing a lot of housework the party for the birthday and picking up items for her and Bob for the home. Yeah.

Q. Let me know when you are ready.

A. Yes.

Q. I am going to come back to

G. C. ROBINSON

my question, which is, when did this begin?

A. I felt some form of it in probably February. It wasn't until probably about March where I really felt that I was being targeted based on my gender, and based on items that she wanted me to do at the apartment that I had objected to.

Q. Isn't it true that the problems with Tiffany actually started in August of 2018?

A. No, that would not be true. And I am not quite sure I met her until September. I can't recall when Bob had me come over and meet her on a Saturday or Sunday.

Q. And in September or October of 2018, she sent you texts that you were uncomfortable with, right?

A. I believe they were September/October. I didn't have much interaction with her in the beginning. It was -- I -- you know.

G. C. ROBINSON

Yeah.

Q. Let's come back to my question.

So around September or October of 2018, she began sending you texts that made you feel uncomfortable, is that right?

A. They were uncomfortable texts. They were. At times.

Q. So in short, yes?

A. Yes, at times.

Q. She referred to you as a unicorn?

A. She referred to me as a unicorn, but she also in some of these texts discussed this perceived notion of Bob and I being so close, and creating such a wonderful home for her to live in, and how she wanted to record the two of us doing this, and she got to benefit from how close Bob and I were in creating this home that she could live in with Bob.

G. C. ROBINSON

Q. And that made you feel uncomfortable?

A. It made me feel uncomfortable in that there was something she was starting to perceive and I had faced that with

[REDACTED]

Q. Let's come back to my question.

You also, I believe, said that there were weird comments that she would make. Are those the ones that you just described?

A. Those are -- are some of them.

Q. What were some of the other weird comments that she made that

1 G. C. ROBINSON

2 you remember?

3 A. She would demean and  
4 denigrate the work that I did. At  
5 one point I had been asked by Bob to  
6 pick out a Christmas tree for -- for  
7 them and for the house. And I  
8 picked one and she was quick to let  
9 me know that when Bob came back from  
10 his trip he said, and I am quoting,  
11 "That tree is so fucking fat, let's  
12 just throw it out and get another  
13 one." And she repeated that to me.  
14 I ended up having to get another  
15 Christmas tree for them. There were  
16 other comments made about setting me  
17 up with a guy that -- like a -- the  
18 RTK worker. And that he and I would  
19 be good together. There were just a  
20 lot of -- of comments that were  
21 concerning and just made me feel  
22 uncomfortable.

23 Q. Would you describe them as  
24 red flags?

25 A. I would describe them as

1 G. C. ROBINSON

2 something of -- something being  
3 uncomfortable that she was  
4 perceiving something that wasn't --  
5 wasn't there.

6 Q. You just told us a story  
7 about a Christmas tree. Obviously  
8 that was before February of 2019,  
9 correct?

10 A. That was December. And  
11 that was about her demeaning me and  
12 sort of letting me know that the  
13 work that I had done -- the  
14 Christmas tree was -- needed to be  
15 replaced, and was just thrown out to  
16 get another one.

17 Q. So this was an unpleasant  
18 interaction that you had with her  
19 before February of 2019, correct?

20 A. I wouldn't characterize it  
21 that way.

22 Q. Okay.

23 How would you characterize  
24 it?

25 A. I wouldn't characterize it

1 G. C. ROBINSON

2 as unpleasant. It was just a  
3 comment that she had made to me,  
4 that I felt degraded me and put down  
5 the work that I was doing,  
6 specifically, for their domestic  
7 life.

8 Q. The work being picking out  
9 a Christmas tree?

10 A. Yes. And then being asked  
11 to decorate it by Bob.

12 Q. There was a point in time  
13 where you gave Bob a hug and she was  
14 very upset.

15 Do you remember that?

16 A. I don't recall her -- I  
17 don't recall ever initiating a hug  
18 with Bob. And I don't recall a time  
19 where she was upset with me giving  
20 Bob a hug. I don't recall either of  
21 those.

22 Q. Okay.

23 Do you think she may have  
24 been jealous based on the fact that  
25 you had this longstanding and close

1 G. C. ROBINSON

2 relationship, and I am not  
3 suggesting there was anything  
4 physical ever between you. I am  
5 asking whether you thought she might  
6 be jealous?

7 A. It is something that Robin  
8 and I discussed, and I also  
9 discussed it with Michael Kaplan,  
10 Michael Tasch, and possibly Tom  
11 Harvey.

12 Q. Alright.

13 I am going to read a couple  
14 of words and I want you to tell me  
15 whether any of these accurately  
16 describe your opinion of Tiffany  
17 Chen during your employment. Okay?

18 A. Yes.

19 Q. Abusive?

20 A. I don't know if I would use  
21 that word.

22 Q. Psychotic?

23 A. Yes, I think there were  
24 times that Michael Tasch or Robin,  
25 those words have been used.

1 G. C. ROBINSON  
 2 Q. That is not my question.  
 3 And if we need to go back to abusive  
 4 we can.  
 5 My question is, which of  
 6 these words accurately describes  
 7 your opinion of Tiffany Chen during  
 8 the course of your employment?  
 9 A. Okay.  
 10 Q. Abusive?  
 11 A. I don't believe I would use  
 12 that word.  
 13 Q. Psychotic?  
 14 A. I think at times in certain  
 15 situations, things didn't logically  
 16 make sense.  
 17 Q. So does that mean the  
 18 answer --  
 19 A. Yes.  
 20 Q. Yes?  
 21 A. Yes.  
 22 Q. Okay.  
 23 [REDACTED]  
 24 A. Yes, I believe that was.  
 25 Q. Suffers from Munchausen?

1 G. C. ROBINSON  
 2 A. Yes, that was in response  
 3 to Tom Harvey.  
 4 Q. I'm sorry, you -- are you  
 5 saying that you told Tom Harvey that  
 6 you believed that Tiffany suffered  
 7 from Munchausen?  
 8 A. It was a conversation  
 9 between Tom Harvey and I where he  
 10 said that she has something when he  
 11 was discussing her mentally. And he  
 12 couldn't think of it, and I said  
 13 Munchausen? And he said, "Yeah, I  
 14 think."  
 15 Q. What is your understanding  
 16 of Munchausen to be?  
 17 A. Somebody creating a false  
 18 situation or -- I can't recall the  
 19 exact definition of Munchausen.  
 20 Q. Okay.  
 21 Someone who acts sick and  
 22 wants to be the center of attention.  
 23 Does that comport with your  
 24 understanding?  
 25 A. Yes.

1 G. C. ROBINSON  
 2 Q. Sociopath?  
 3 A. Yes.  
 4 Q. Drunk with power?  
 5 A. At times.  
 6 Q. Mean?  
 7 A. I think at times.  
 8 Q. Manipulative?  
 9 A. I think at times that would  
 10 apply.  
 11 Q. Insecure?  
 12 A. I think at times that would  
 13 apply.  
 14 Q. I would like to talk now  
 15 about how Tiffany made you feel.  
 16 Am I correct that you felt  
 17 Tiffany did not like you?  
 18 A. Towards the end of my  
 19 employment, I began to feel that  
 20 there was -- that that existed after  
 21 March probably March 27th, around  
 22 March 27th.  
 23 Q. So it was at the end of  
 24 March that you began to get the  
 25 sense that she didn't like you, is

1 G. C. ROBINSON  
 2 that what you are saying?  
 3 A. I think that there were  
 4 issues of me being involved in the  
 5 house at a certain point in that  
 6 late February to March period. I  
 7 had tried to remove myself from the  
 8 house multiple times, but -- in  
 9 January as well and continued a  
 10 discussion with Bob.  
 11 Q. In January, didn't Tiffany  
 12 make clear to you that she didn't  
 13 want you involved in the house, the  
 14 house being [REDACTED]?  
 15 A. I can't recall. I recall  
 16 me speaking to Bob about not wanting  
 17 to be involved in the house.  
 18 Q. Do you have any  
 19 recollection of telling Robin  
 20 Chambers, that it was made clear to  
 21 you in January, by Tiffany, that she  
 22 did not want you involved in the  
 23 house?  
 24 A. I believe that is something  
 25 that Robin and I discussed, but it

1 G. C. ROBINSON  
2 is not based on Tiffany specifically  
3 saying to me I don't want you being  
4 involved in the house. It is a  
5 feeling of that she wanted to handle  
6 the house. But I was still being  
7 asked to do the house work and help  
8 with the domestic life by Bob, who  
9 specifically requested that I do  
10 specific things.

11 Q. Was Tiffany out for you?

12 A. I felt targeted by her, but  
13 out for me maybe towards -- I felt  
14 that way maybe towards the last week  
15 of my employment.

16 Q. Did you feel that she --  
17 that she was a threat to your  
18 employment?

19 A. Not to my employment until  
20 the very end of my employment.

21 Q. Did you feel that she was  
22 out, or to use your word, targeting  
23 others?

24 A. During my employment I was  
25 concerned that she might target

1 G. C. ROBINSON  
2 other female executive assistants,  
3 and it was something that I voiced  
4 concern with both Robin and Michael  
5 Tasch about.

6 MR. DROGIN: Can you read  
7 back my question?

8 (Whereupon, the requested  
9 portion was read back by the  
10 reporter:

11 Q: Did you feel that she  
12 was out, or to use your word,  
13 targeting others?)

14 A. As I said, I was concerned  
15 about her possibly targeting other  
16 female executive assistants.

17 Q. And did she target other  
18 female executive assistants?

19 A. Not that I am aware of.  
20 This is at the tail end of my  
21 employment with Canal.

22 Q. Did she target Tom Harvey?

23 A. Not that I am aware of.

24 Q. Did she target Michael  
25 Tasch?

1 G. C. ROBINSON  
2 A. I don't know if she had  
3 targeted him. I am aware that  
4 Michael Tasch had told me that there  
5 had been some e-mails that had been  
6 sent to Mark Bosswick about him.  
7 And in the conversation he, I  
8 believe, had already consulted an  
9 attorney, and said that, "You and  
10 I," meaning, me, could sue her for  
11 what she was saying.

12 Q. So just so we are clear.  
13 You and Michael Tasch had a  
14 conversation, where among other  
15 things, he was talking about suing  
16 Tiffany, isn't that right?

17 A. Not necessarily suing, but  
18 I believe that he had been in  
19 contact with somebody about some  
20 e-mails that had been sent, and I  
21 don't recall exactly when -- when  
22 that was.

23 Q. Do you recall having a  
24 conversation with Michael Tasch  
25 where you told him your

1 G. C. ROBINSON  
2 understanding of the labor law and  
3 whether or not you and he could sue  
4 Tiffany?

5 A. No. For me, no, I don't  
6 recall that.

7 Q. Did you believe that  
8 Tiffany was targeting Michael  
9 Kaplan?

10 A. I believe that there were  
11 certain things that she was unhappy  
12 with. But, again, targeting, I -- I  
13 don't think that she was  
14 specifically targeting him the way  
15 that I felt she was targeting me.

16 Q. What kind of things was she  
17 unhappy with about Michael Kaplan  
18 based on your knowledge and  
19 understanding?

20 A. I will give an example.  
21 She was unhappy that Michael Kaplan  
22 was unable to be present when I  
23 believe the dishwasher needed to be  
24 fixed and needed to move the  
25 appointment to be there for the



1 G. C. ROBINSON  
2 maintenance guy. And she wanted it  
3 done, so she ended up doing it. I  
4 think she was upset that Michael  
5 Kaplan told her that he couldn't be  
6 there because he had other work.

7 Q. Did Michael Kaplan have to  
8 do with anything at [REDACTED]

9 A. He did some of the  
10 maintenance and wait for delivery.  
11 He also dealt with the Robert De  
12 Niro, Sr., paintings.

13 Q. Anything else that you  
14 recall?

15 A. A washer and dryer that  
16 needed to be put in, and technology,  
17 TVs, Internet. He helped Dan Harvey  
18 with the gym.

19 Q. Anything else that you can  
20 recall?

21 A. Not that I can recall at  
22 this moment.

23 Q. From your understanding,  
24 were those things part of Michael  
25 Kaplan's job?

1 G. C. ROBINSON

2 A. He handled some of the  
3 maintenance at Bob's other  
4 properties, such as, 110 Hudson  
5 Street, Bob's gym apartment, in  
6 addition to Bob's fathers' art  
7 studio.

8 Q. I am confining my question  
9 to [REDACTED] because that is what you  
10 have described that you were -- you  
11 were brought in on. What other  
12 duties and responsibilities, if any,  
13 did he have towards [REDACTED]

14 A. He handled the security  
15 cameras.

16 Q. And my question is, these  
17 things that he was being asked to do  
18 at [REDACTED], was that part of his  
19 regular job or was this in addition  
20 to his regular Canal job?

21 A. They were things that Bob  
22 had asked him to do.

23 Q. Right. But they were in  
24 line with his regular Canal job or  
25 were these like with you, additional

1 G. C. ROBINSON  
2 things that you were made to do?

3 A. I don't know if you would  
4 call it additional. I think that  
5 they -- the core responsibility --  
6 the core material duties at Canal  
7 Productions were to do what Bob  
8 asked of you. That means everybody.

9 MR. DROGIN: Can you read  
10 that back?

11 (Whereupon, the requested  
12 portion was read back by the  
13 reporter:

14 A: I don't know if you  
15 would call it additional. I  
16 think that they -- the core  
17 responsibility -- the core  
18 material duties at Canal  
19 Productions were to do what  
20 Bob asked of you. That means  
21 everybody.)

22 Q. So are you saying that  
23 everybody at Canal was being asked  
24 to do personal things for Bob?

25 A. No. What I am trying to

1 G. C. ROBINSON

2 say is that I don't believe these  
3 were additional duties. I think  
4 that the job, as we all function as  
5 executive assistants, regardless of  
6 title were to do what Bob asked.  
7 For example, when I objected to  
8 wanting to do work with Toukie Smith  
9 not only based on health and [REDACTED]  
10 [REDACTED], but also financial stuff,  
11 and working on the [REDACTED] project, and  
12 objected to that. Bob said that I  
13 had to continue to do that. He  
14 redirected my job to solely work on  
15 that, and that was what became my  
16 job. So additional, I don't know,  
17 because I was -- my job was  
18 redirected to handle all these  
19 personal things for him, and that  
20 was what my job was under VP of  
21 production/finance and it had  
22 nothing do with my title. I don't  
23 believe it was additional duty. It  
24 was the job that Bob gave me.

25 Q. Just so we are clear, other

1 G. C. ROBINSON  
2 people at Canal were also used for  
3 handling Bob's personal affairs?

4 A. The female executive  
5 assistants handled more centered on  
6 typically female-gendered roles.  
7 Helping Bob with kid's schedules,  
8 same with me, picking out -- I  
9 picked out presents at Christmas  
10 time, went shopping with him,  
11 created photo albums for his  
12 anniversary, things for his kid's  
13 birthday, handled his prescriptions,  
14 medications, supplements. There  
15 were --

16 Q. This is for throughout the  
17 entire 11 years, is that right?

18 A. Yes.

19 Q. But the change in  
20 2018/2019, is it additional  
21 responsibilities, those related to  
22 [REDACTED], correct?

23 A. I don't think you would  
24 characterize it, as I said,  
25 additional responsibilities. Bob

1 G. C. ROBINSON  
2 redirected my role and job to  
3 prioritize and solely work on these  
4 specific -- the domestic house,  
5 helping Toukie Smith with her needs  
6 and her [REDACTED], helping Bob  
7 with his divorce, things of personal  
8 nature.

9 Q. Okay.

10 And this was redirected  
11 starting March of 2019, is that  
12 right?

13 A. No. It was a conversation  
14 that I had in September -- late  
15 September, beginning of October,  
16 when I objected to working on this  
17 -- these items. And he had  
18 redirected my job.

19 Q. Okay.

20 With regard to [REDACTED], wasn't  
21 Tiffany running the show, not Bob?

22 A. I wouldn't characterize it  
23 that way. Bob was making the  
24 decisions on the house and the  
25 contents of the house.

1 G. C. ROBINSON  
2 Q. Okay.

3 But I am coming back to  
4 something that you said to Robin,  
5 that Tiffany was quote, "running the  
6 show."

7 Do you not stand by that  
8 comment?

9 A. I stand by the comment in  
10 -- but I don't know the context of  
11 what Robin and I were discussing  
12 when I said that. So unless you can  
13 tell me the full context of it, then  
14 you know --

15 Q. Was Tiffany trying to force  
16 you out?

17 A. That was a feeling that I  
18 got.

19 Q. Did she try to keep you out  
20 of the loop?

21 A. That was a feeling that I  
22 got the last couple of days of my  
23 employment, and Bob was -- was aware  
24 of all -- was aware of e-mails or  
25 conversations. And he and I talked.

1 G. C. ROBINSON  
2 Q. Isn't it true that you  
3 didn't want to be involved in a  
4 triangle between Bob and Tiffany,  
5 and that you were pulling away from  
6 the Bob and Tiffany dynamic?

7 A. I didn't want to be  
8 involved in -- in personal items. I  
9 was -- I worked at Canal  
10 Productions. It was -- I was  
11 business related, not personal  
12 related, and I didn't feel it was  
13 appropriate to be pulled in to any  
14 triangle that had nothing to do with  
15 -- with my work at Canal  
16 Productions. It really crossed what  
17 the employer/employee relationship  
18 should be. To be dragged into --  
19 into personal items such as that.

20 Q. And just so I am clear,  
21 these personal items that you felt  
22 were not to be part of the  
23 employment -- employer/employee  
24 relationship, those were the same  
25 types of things that you had been



1 G. C. ROBINSON

2 doing for 11 years, right, because  
3 you told us earlier that your job  
4 title didn't change?

5 A. There were certain items  
6 and many of them I objected to or  
7 had conversations with Bob about not  
8 being involved in. Personal items  
9 when it came to [REDACTED] or the kids.  
10 There were many conversations about  
11 that, but Bob continued to redirect  
12 my job to these personal items, or  
13 -- or being a part of things that he  
14 and I had already discussed that I  
15 objected to.

16 Q. Did that impact your  
17 ability to do the other aspects of  
18 your job?

19 A. When Bob would redirect my  
20 job or prioritize my job, it would  
21 change what my job was.

22 Q. These redirections that you  
23 are talking about, were any of them  
24 permanent or were they situational?

25 A. I think some of them were

1 G. C. ROBINSON

2 situational, and some of them were  
3 permanent. But I would add that  
4 regardless of my objection in doing  
5 these, he would -- I would end up  
6 having to do them. Or he would  
7 redirect it and there were  
8 conversations where I would have to  
9 sit down with Bob and constantly  
10 realign my job, and find myself  
11 forced to do these personal items  
12 after that conversation. It was  
13 incredibly frustrating and  
14 demeaning. It was something that  
15 was strenuous through my employment.

16 Q. And the duties and  
17 responsibilities regarding [REDACTED], was  
18 that situational or was that  
19 permanent?

20 A. When we discussed it in  
21 September and October, it was  
22 permanent in where he redirected  
23 don't do this work, do less work.  
24 And when I objected to doing it, he  
25 said that I was shaking him down,

1 G. C. ROBINSON

2 and that he needed me to do the  
3 Toukie Smith work, and the apartment  
4 work, and that is what needed to be  
5 done and prioritized. So I would  
6 say that that was permanent. And  
7 then a discussion that we had in  
8 January I tried to realign my  
9 position again, objected to doing  
10 additional work in the house where  
11 he made me agree to finishing four  
12 items that had to do with the hours,  
13 but I found myself involved more and  
14 more in Bob's domestic and personal  
15 life, and yeah.

16 Q. So you understood that that  
17 was going to be permanent, that was  
18 going to be a permanent part of your  
19 job, is that right?

20 A. It seemed as if it was  
21 going to be a permanent part of my  
22 job for the design, and for putting  
23 the house together, and working on  
24 that project. It was prioritized so  
25 I don't --

1 G. C. ROBINSON

2 Q. But what I am getting at  
3 is, was that project or was that you  
4 were -- it was now a component of  
5 your position from then on until the  
6 future was going to be the design  
7 furnishing of this home, what was  
8 your understanding?

9 A. My understanding is that  
10 Bob wanted that prioritized and  
11 everything else was pushed to the  
12 side other than the work at [REDACTED].  
13 The domestic, and housework, and  
14 then also the Toukie Smith items  
15 that is needed to be done. It was  
16 incredibly frustrating, and has  
17 nothing do with my title, with my  
18 title of VP finance. It had nothing  
19 to do with Canal Productions. It  
20 had to do with Bob's domestic home  
21 life, and the life of his  
22 ex-girlfriend.

23 Q. You were an at-will  
24 employee to be clear, right?

25 A. I believe so.

1 G. C. ROBINSON  
 2 Q. You didn't have an  
 3 employment agreement guaranteeing  
 4 you employment, did you?  
 5 A. No, not that I am aware of.  
 6 Q. He could have terminated  
 7 you at any time, correct?  
 8 A. Yes.  
 9 Q. You could have left at any  
 10 time?  
 11 A. No. That was -- I don't  
 12 believe that that would be correct.  
 13 Q. You couldn't have -- you  
 14 couldn't have resigned if you wanted  
 15 to?  
 16 A. I had resigned on multiple  
 17 occasions and was unable to resign  
 18 for -- for many reasons.  
 19 Q. Okay. I guess we will come  
 20 back to that.  
 21 Now, in February of 2019,  
 22 you were in London, is that right?  
 23 A. Can you repeat your  
 24 question? You broke up for a  
 25 second.

1 G. C. ROBINSON  
 2 Q. In February of 2019, you  
 3 were in London?  
 4 A. Yes, that is I believe  
 5 correct.  
 6 Q. You came back around  
 7 February 25th?  
 8 A. I can't recall when I came  
 9 back.  
 10 Q. When you came back from  
 11 London, did you notice that Bob  
 12 wasn't talking to you?  
 13 A. When I had come back from  
 14 -- from London, he actually had  
 15 given me a call when I landed so I  
 16 don't -- so I don't think that would  
 17 be completely correct.  
 18 Q. Okay.  
 19 When you came back from  
 20 London, did you feel that you were  
 21 going to be fired?  
 22 A. No.  
 23 Q. Did somebody tip you off  
 24 that you were going to be fired?  
 25 A. No.

1 G. C. ROBINSON  
 2 Q. In other words, had someone  
 3 told you that you were going to be  
 4 fired, notwithstanding how you  
 5 felt?  
 6 A. No.  
 7 Q. Did you begin to feel like  
 8 you meant nothing to Bob?  
 9 A. I wouldn't characterize it  
 10 that way. I feel that --  
 11 Q. I mean, I have your answer.  
 12 That is fine.  
 13 A. I don't know. I don't know  
 14 if I would characterize it that way.  
 15 Q. And at that point in time  
 16 when you came back from London, is  
 17 it true that Tiffany was harassing  
 18 you daily?  
 19 A. I feel there were a lot of  
 20 -- of items that she was requiring  
 21 of me to do, and on a lot of  
 22 demeaning work and issues with the  
 23 house that even when I was in London  
 24 I was getting calls and e-mails  
 25 about.

1 G. C. ROBINSON  
 2 Q. So if you told Robin that  
 3 Tiffany had been harassing you  
 4 daily, was that an exaggeration?  
 5 A. I think all e-mails and  
 6 issues of the house and items that  
 7 she was asking me to do, and was,  
 8 you know, harassment on the  
 9 apartment items -- house items. The  
 10 -- for example, putting together a  
 11 --  
 12 Q. I don't need examples. She  
 13 accused you of stealing pots and  
 14 pans at one point, correct?  
 15 A. Yes. I had spoken to both  
 16 Bob and Tom Harvey about that.  
 17 Q. The answer to my question  
 18 is yes?  
 19 A. Can I finish, please?  
 20 Q. No. It is a yes-or-no  
 21 question. The judge has limited us  
 22 to at least one day, I don't think  
 23 we would like a third.  
 24 She accused you of screwing  
 25 up something regarding catering on a

1 G. C. ROBINSON  
 2 plane, correct?  
 3 A. She had made a bizarre  
 4 accusation about that.  
 5 Q. She told you to stop  
 6 e-mailing her?  
 7 A. I had never -- I don't  
 8 recall ever her saying stop  
 9 e-mailing me.  
 10 Q. Did you feel she was  
 11 controlling Bob at that time?  
 12 A. No, I believe Bob was aware  
 13 of everything. He was CC'd on all  
 14 the e-mails. It was discussed with  
 15 him.  
 16 Q. Did you believe that Bob  
 17 was merely relaying what she had  
 18 told him to say to you?  
 19 A. I wouldn't say all the  
 20 time. I think that there was maybe  
 21 one thing that conversation where  
 22 she was adding, you know, items that  
 23 she wanted to have Bob include.  
 24 Q. Did you believe that she  
 25 was ghostwriting e-mails from him to

1 G. C. ROBINSON  
 2 you?  
 3 A. I --  
 4 Q. I will include texts in  
 5 that. E-mail or texts?  
 6 A. I don't know. I mean, I  
 7 think that --  
 8 Q. You said that you don't  
 9 know, so that is fine. Did she want  
 10 you gone?  
 11 A. I believe that is something  
 12 that I felt at the very end of the  
 13 last couple of days.  
 14 Q. Did you feel that your job  
 15 had been taken away from you?  
 16 A. I believe, in general, my  
 17 job had been taken away when Bob  
 18 redirected me to his domestic -- to  
 19 handle his domestic home life and  
 20 personal items. My job at Canal  
 21 Productions kind of had been  
 22 redirected to all of this gender  
 23 female role where I was handling  
 24 this housework, and vacuuming, and  
 25 doing all of these things, and

1 G. C. ROBINSON  
 2 organizing closets, and washing bed  
 3 sheets and making his bed. This is  
 4 what my job had become. It had  
 5 nothing do with VP production of  
 6 finance. That was incredibly  
 7 demeaning and frustrating for me to  
 8 deal with.  
 9 Q. And when did that  
 10 redirection start?  
 11 A. I had spoken to Bob and  
 12 objected to this work at the end of  
 13 September, beginning of October.  
 14 Q. Hadn't you agreed, in fact,  
 15 to Bob's request that you take this  
 16 on?  
 17 A. I had objected to it, but I  
 18 didn't have a choice. It is  
 19 something that he asked me to, and I  
 20 had to.  
 21 Q. Didn't you tell Robin  
 22 Chambers that you agreed to it  
 23 because you cared about him?  
 24 A. I might have said that  
 25 during the time when I was basically

1 G. C. ROBINSON  
 2 mentally breaking down, and not  
 3 eating or sleeping because of the  
 4 incredibly toxic work environment  
 5 and just the -- just everything that  
 6 had been -- been going on. It was  
 7 very difficult at that time. I  
 8 think that -- I think that it was a  
 9 very traumatic time where I was  
 10 really sort of breaking down under  
 11 the work, and the harassment, and  
 12 everything that was going on.  
 13 Q. Was it a traumatic time for  
 14 Bob, in your opinion, having come  
 15 back from [REDACTED], having -- going  
 16 through [REDACTED],  
 17 having to have a townhouse furnished  
 18 for him?  
 19 A. I don't believe it is the  
 20 place of an employer to put his  
 21 personal problems on an employee. I  
 22 don't -- I can't speculate what he  
 23 found to be traumatic or not. I can  
 24 only speak to what I felt.  
 25 Q. I am asking -- I am not

1 G. C. ROBINSON  
2 asking for the 60-minute answers. I  
3 am asking for your impression as to  
4 whether or not Robert De Niro was  
5 going through a traumatic time in  
6 his life, in the fall of 2018 into  
7 early 2019?

8 A. I don't know. These are  
9 decisions that he made. And again,  
10 he is an employer that should not  
11 put an employee in a position of  
12 having to deal with his, you know,  
13 personal issues.

14 Q. Okay.

15 Can you answer --

16 MS. HARWIN: I just -- if  
17 you could sort of find a good  
18 time for a lunch break, that  
19 would be -- that would be  
20 appreciated.

21 MR. DROGIN: Sure.

22 Q. In your opinion, was this a  
23 traumatic time in his life?

24 A. I don't -- I don't know.

25 Q. Did you believe it was a

1 G. C. ROBINSON

2 difficult time in his life?

3 A. I don't know if I would  
4 separate the decisions that he made,  
5 or what he was going through with  
6 other -- other times. I don't know  
7 if it was or wasn't.

8 Q. Okay.

9 MR. DROGIN: Can you read  
10 back my question?

11 (Whereupon, the requested  
12 portion was read back by the  
13 reporter:

14 Q: Did you believe it  
15 was a difficult time in his  
16 life?)

17 A. I don't know.

18 Q. Isn't it true that you  
19 resigned because of Tiffany, not  
20 Bob?

21 A. No, I wouldn't say that is  
22 true.

23 Q. Did you tell Robin --  
24 didn't you tell Robin, "In the end  
25 it wasn't him. It was Tiffany?"

1 G. C. ROBINSON

2 A. Again, I don't know the  
3 full context of the -- of the  
4 discussion, but I will say that I  
5 had reached out to Bob on multiple  
6 occasions to discuss and try to fix,  
7 you know, the issues that were going  
8 on. And my employer wasn't  
9 resolving any of these issues in the  
10 beginning of April and end of March.  
11 And it made it very difficult to the  
12 point where for me it was very  
13 emotionally distressing that my  
14 employer wasn't speaking to me about  
15 these issues. And I had hit a  
16 breaking point where I wasn't eating  
17 or sleeping. It was very traumatic  
18 for me, and I couldn't continue.

19 (Playing recording)

20 Q. Didn't you resign because  
21 of Tiffany not Bob?

22 MS. HARWIN: Can you  
23 identify for the record what  
24 -- what this exhibit is that  
25 you are using and what the

1 G. C. ROBINSON

2 corresponding Bates number  
3 is?

4 MR. DROGIN: No. I am  
5 just asking the witness  
6 whether or not she told Robin  
7 that she resigned because of  
8 Tiffany not Bob.

9 MS. HARWIN: Is the  
10 content of what was just  
11 played part of the record?

12 THE COURT REPORTER: It  
13 was not taken down on the  
14 record, as I couldn't hear it  
15 clearly.

16 Q. Didn't you tell that to  
17 Robin?

18 MS. HARWIN: Is it part  
19 of the record or not?

20 MR. DROGIN: Yeah, it is  
21 part of the record.

22 MS. HARWIN: It needs to  
23 be identified in some way.

24 MR. DROGIN: I will  
25 identify it after the witness

1 G. C. ROBINSON  
 2 answers my question as to  
 3 whether or not she told that  
 4 to Robin. That is my  
 5 question. We have hours of  
 6 these conversations where she  
 7 tells the truth.  
 8 Q. So my question is, didn't  
 9 you resign because of Tiffany, not  
 10 because of Bob?  
 11 A. No. Again, it is part of  
 12 -- you know.  
 13 Q. Thank you.  
 14 A. And having a context of --  
 15 can I please finish?  
 16 Q. No. It was a yes-or-no  
 17 question. You said no. I take your  
 18 answer at its word because you  
 19 were --  
 20 (Simultaneous speaking)  
 21 Q. You had an agreement with  
 22 Bob that you would work with him for  
 23 two years, correct?  
 24 A. We had a discussion that I  
 25 -- I wanted to transition out of

1 G. C. ROBINSON  
 2 Canal Productions, and I would make  
 3 sure that items were handled for him  
 4 and he was comfortable with whatever  
 5 needed to be transferred over to  
 6 somebody else, and that it would  
 7 take, you know, up to two years.  
 8 But it was something that he and I  
 9 would discuss.  
 10 Q. And if Tiffany had been out  
 11 of the picture, would you have  
 12 honored that commitment?  
 13 A. I would have tried however  
 14 I could have tried to honor a  
 15 commitment that I made.  
 16 Q. I am asking specifically if  
 17 Tiffany was out of the picture.  
 18 Would you have tried to honor that  
 19 commitment?  
 20 A. As I said, I would try to  
 21 honor a commitment that I made. I  
 22 can't tell you what it would have  
 23 been with or without Tiffany. I  
 24 mean, you know --  
 25 Q. You didn't honor your

1 G. C. ROBINSON  
 2 commitment, did you, you resigned?  
 3 A. I resigned because it  
 4 became -- it hit a breaking point  
 5 where I wasn't able to -- to  
 6 continue with my job, as I said. I  
 7 was not eating or sleeping. I was  
 8 under a lot of -- had a lot of  
 9 anxiety and just could not continue.  
 10 Q. Okay.  
 11 MS. HARWIN: Are we at a  
 12 good point for lunch?  
 13 MR. DROGIN: We are. And  
 14 the -- just so we can provide  
 15 you with the sampling, that  
 16 was Robinson recording number  
 17 63. That appears at roughly  
 18 the 17 minute -- ten to 17:50  
 19 mark. It is -- it is in  
 20 there. I think going forward  
 21 what we will do is have these  
 22 things ready, and when we  
 23 play back the conversations,  
 24 we will identify them at that  
 25 time.

1 G. C. ROBINSON  
 2 What time do you want to  
 3 come back, 1:30?  
 4 MS. HARWIN: That is  
 5 fine. Or 1:15?  
 6 MR. DROGIN: You choose.  
 7 MS. HARWIN: Let's split  
 8 the difference. Let's say  
 9 1:20.  
 10 MR. DROGIN: 1:20 it is.  
 11 (Whereupon, a recess was  
 12 taken at this time.)  
 13 EXAMINATION BY  
 14 MR. BENNETT:  
 15 Q. Good afternoon, Ms.  
 16 Robinson. My name is Gregory  
 17 Bennett. I represent Defendants in  
 18 this case. I am going to be taking  
 19 over the questioning from attorney  
 20 Drogin for a little while.  
 21 Okay?  
 22 A. Okay.  
 23 Q. In some of the answers that  
 24 you provided in attorney Drogin's  
 25 questions, it appeared that you may

1 G. C. ROBINSON  
 2 have lost track of the question. I  
 3 would just ask that you try to  
 4 please confine your answer to the  
 5 question.  
 6 Do you understand?  
 7 A. Yes.  
 8 Q. Thank you.  
 9 You went to Sacred Heart  
 10 for high school, is that right?  
 11 A. No.  
 12 Q. Where did you go to high  
 13 school?  
 14 A. Saddle River Day School.  
 15 Q. Did you go to a school  
 16 called Sacred Heart at some point?  
 17 A. Yes.  
 18 Q. When?  
 19 A. I went -- I don't know the  
 20 years off the top of my head, but I  
 21 went there from kindergarten to  
 22 beginning of the high school.  
 23 Q. Okay.  
 24 Saddle River Hill did you  
 25 say?

1 G. C. ROBINSON  
 2 A. Saddle River Day School.  
 3 Q. Excuse me.  
 4 That is in New Jersey?  
 5 A. Yes.  
 6 Q. After you graduated from  
 7 high school, did you immediately  
 8 begin attending St. Lawrence or did  
 9 you work in between?  
 10 A. I immediately attended St.  
 11 Lawrence.  
 12 Q. Did you focus in a  
 13 particular area of study?  
 14 A. English writing, speech and  
 15 theater and film.  
 16 Q. And did you have a minor?  
 17 A. Let me clarify. Film, and  
 18 speech, and theatre were minors. My  
 19 major was English writing.  
 20 Q. And did you graduate from  
 21 St. Lawrence?  
 22 A. Yes.  
 23 Q. What type of degree?  
 24 A. BA.  
 25 Q. Okay.

1 G. C. ROBINSON  
 2 What year did you graduate?  
 3 A. 2005.  
 4 Q. Aside from the BA that you  
 5 acquired from St. Lawrence  
 6 University, in 2005, have you  
 7 obtained any other degrees from  
 8 educational institutions?  
 9 A. No other official degrees.  
 10 Q. Okay.  
 11 Have you obtained any  
 12 certifications or licenses in any  
 13 professional, clinical, or education  
 14 area?  
 15 A. No. Over the last year I  
 16 do have certifications from classes  
 17 that I took in Spanish.  
 18 Q. Okay.  
 19 Are you a certified  
 20 personal trainer?  
 21 A. No.  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 Q. Have you obtained any  
 25 formal medical training which

1 G. C. ROBINSON  
 2 resulted in the acquisition or  
 3 earning of a degree or certificate  
 4 at all?  
 5 A. Not in the field of  
 6 medicine or medical.  
 7 Q. Okay.  
 8 After graduating from St.  
 9 Lawrence, did you start at Cardenas  
 10 (ph)?  
 11 A. I -- Cardenas was my first  
 12 official job after college.  
 13 Q. You might have had a summer  
 14 in between, but that was the first  
 15 real job, correct?  
 16 A. Yes.  
 17 Q. How did you get that job?  
 18 MS. HARWIN: Objection to  
 19 the form.  
 20 A. I had sent my resume to, I  
 21 believe, the HR at Cardenas, and I  
 22 was, I believe, called about the  
 23 position.  
 24 Q. Had your mom worked at  
 25 Cardenas or did she work elsewhere



1 G. C. ROBINSON  
 2 at that time?  
 3 MS. HARWIN: Objection to  
 4 the form.  
 5 A. She was not currently  
 6 working at Cardenas at the time.  
 7 Q. As far as you can recall,  
 8 back when you applied to the  
 9 position with Cardenas, did your mom  
 10 have any type of acquaintances, or  
 11 friendships, or was colleagues with  
 12 anyone who was then employed with  
 13 Cardenas?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. I can't -- I can't recall  
 17 who -- I can't recall what  
 18 colleagues or who my mother would  
 19 have -- had contacts with. She  
 20 worked -- she had worked at Cardenas  
 21 when she was younger.  
 22 Q. As far as you can recall,  
 23 did your mom pull strings to get you  
 24 the job or not?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 the form.  
 3 A. I am not aware of her  
 4 pulling strings to get me employed  
 5 at Cardenas.  
 6 Q. Okay.  
 7 What was the job that you  
 8 were hired into at Cardenas?  
 9 A. To be the assistant to  
 10 Michael Robert, who was the fashion  
 11 style director at Vanity Fair.  
 12 Q. And generally -- you don't  
 13 have to go into too much detail.  
 14 But generally what were your job  
 15 responsibilities in that position?  
 16 A. Picking up the phone,  
 17 scheduling meetings for him, towards  
 18 the end I started to help and he  
 19 gave me the opportunity to produce  
 20 photo shoots with him.  
 21 Q. How long did you serve in  
 22 that role?  
 23 A. Almost two years, I  
 24 believe.  
 25 Q. And why did you leave?

1 G. C. ROBINSON  
 2 A. I left because I wanted to  
 3 work in the film industry, not in  
 4 publishing magazines or fashion.  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 G. C. ROBINSON  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 Q. Okay.  
 7 Prior to February of 2020,  
 8 you were a fairly avid runner, is  
 9 that right?  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 A. I would say prior to  
 13 sometime in the winter of 2019,  
 14 being February or March.  
 15 Q. Okay.  
 16 So before then you were an  
 17 avid runner?  
 18 A. Yes.  
 19 Q. Okay.  
 20 Why did you run?  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. Running was a way for me to  
 24 battle the anxiety and stress that I  
 25 faced. A way to relieve stress,

1 G. C. ROBINSON

2 anxiety.

3 Q. I don't want to interrupt  
4 you. Are you complete?

5 A. That is -- I mean, that is  
6 what I can say at that moment.

7 Q. Aside from experiencing  
8 some relief regarding anxiety issues  
9 that you may have experienced, did  
10 you otherwise enjoy running?

11 MS. HARWIN: Objection to  
12 the form.

13 A. I enjoyed running because  
14 it gave me a mental break and helped  
15 with my anxiety and stress. It gave  
16 me this blank sort of Zen feeling to  
17 relieve it.

18 Q. Between January of 2016,  
19 and April of 2019, how frequently,  
20 on average, ballpark, would you run  
21 per week?

22 A. I can't recall weeks and  
23 months. It varies depending on what  
24 was going on with -- with work, or  
25 weather, or -- I just wouldn't be

1 G. C. ROBINSON

2 able to put an average to it.

3 Q. Could you give me a low and  
4 a high?

5 MS. HARWIN: Objection to  
6 the form.

7 A. I wouldn't be able to.

8 Q. Were there times where you  
9 ran ten times a week?

10 MS. HARWIN: Objection to  
11 the form.

12 A. No.

13 Q. Okay.

14 Were there times when you  
15 didn't run at all on a particular  
16 week?

17 MS. HARWIN: Objection to  
18 the form.

19 A. Again, as I said, it  
20 varied. So I just I can't recall  
21 all the way from 2016 to 2019.

22 Q. Right.

23 What did it vary on, the  
24 level of stress?

25 A. Sorry?

1 G. C. ROBINSON

2 Q. The level of stress, is  
3 that what it varied on?

4 MS. HARWIN: Objection to  
5 the form.

6 A. Not necessarily. As I  
7 said, it varied depending on work,  
8 or weather, or, I mean, there were  
9 many factors so --

10 Q. Okay.

11 I am just trying to have  
12 some notion as to how much you would  
13 run per week. We can take it on a  
14 monthly basis.

15 Can you assume any  
16 numerical number to how often a week  
17 or month you would run? Would you  
18 run 20 times a month, or --

19 A. I mean, I would say -- I  
20 would say more often than not, but  
21 again, I can't -- anything varied  
22 upon what was depending on the job,  
23 what the weather was, if I had time,  
24 there are a bunch of factors. And I  
25 wouldn't be able to recall a month

1 G. C. ROBINSON

2 or, you know, put an average to a  
3 month or week because everything  
4 varied.

5 Q. Okay.

6 Was there a point in time  
7 where a bad condition developed  
8 which impaired or constricted you  
9 from running?

10 A. Yes.

11 Q. When was that?

12 A. During the project with the  
13 apartment.

14 Q. So late fall, early -- late  
15 fall of 2018, early 2019?

16 MS. HARWIN: Objection to  
17 the form.

18 A. Late fall. Late fall it  
19 became incredibly painful. In  
20 January it became unbearable, and  
21 the pain continued for quite a bit.

22 Q. Have you been able to  
23 resume running today?

24 A. No.

25 MS. HARWIN: Objection to



1 G. C. ROBINSON  
2 the form.

3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
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22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

1 G. C. ROBINSON

2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 We have had many conversations about  
13 not being able to run, or the  
14 anxiety or stress that I had been  
15 going through with this. I started  
16 seeing her at a time when I had just  
17 found out that I was being  
18 investigated by the Manhattan  
19 District Attorney's Office where I  
20 had a lot of panic and anxiety.  
21 That was very much unbearable.

22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

1 G. C. ROBINSON  
2 the form.

3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
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21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

1 G. C. ROBINSON

2 Q. Okay.  
3 Do you recall --  
4 MS. HARWIN: Counsel, I  
5 just want to note for the  
6 record, I don't believe that  
7 Defendants have produced to  
8 Plaintiff any medical records  
9 that you have obtained from  
10 Dr. [REDACTED]. If you have  
11 obtained from Dr. [REDACTED] any  
12 medical records, we would  
13 request those be produced to  
14 us, preferably today, while  
15 the deposition is pending.

16 MR. BENNETT: They are  
17 Plaintiff's own medical  
18 records.

19 MS. HARWIN: We are  
20 entitled to them.

21 MR. BENNETT: Does  
22 Plaintiff not have these  
23 records?

24 MS. HARWIN: We don't  
25 have a copy of whatever you

1 G. C. ROBINSON

2 received from Dr. [REDACTED], no.

3 MR. BENNETT: You don't  
4 have any medical records from  
5 Dr. [REDACTED]

6 MS. HARWIN: We don't  
7 have a copy of whatever Dr.  
8 [REDACTED] provided to you.

9 MR. BENNETT: That is not  
10 what I am asking. Do you  
11 have the medical records  
12 independently? Than what is  
13 the issue?

14 MS. HARWIN: I simply  
15 note that Defendants haven't  
16 produced these documents in  
17 discovery. If you are  
18 relying on them, we are  
19 entitled to have them.

20 MR. BENNETT: The  
21 Defendants will make those  
22 records available to you  
23 following the deposition.

24 (Whereupon, a discussion  
25 was held off the record.)

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]

10 Q. Do you remember ever  
11 suggesting that it was because of  
12 Mr. De Niro that you didn't want to  
13 go outside?

14 A. I can't -- I can't recall  
15 specifically why or what I had said  
16 to her. I can recall the time not  
17 feeling safe and wanting to go out.  
18 I had just found out that I was  
19 being investigated with the false  
20 allegations, and I did not feel  
21 safe. I had mentioned to her that  
22 Bob was at times in my neighborhood,  
23 and that I had run into him and that  
24 I didn't necessarily want to go out  
25 or feel safe going out. I had a lot

1 G. C. ROBINSON  
2 of anxiety and felt safe at home. I  
3 felt --

4 (Simultaneous speaking)

5 Q. Sorry.

6 A. I am finished.

7 Q. And you had concerns for  
8 your physical safety or something  
9 else?

10 A. Again, I can't recall  
11 specifically what I said to her.  
12 But I do remember feeling that it  
13 was very difficult. I was  
14 incredibly humiliated and  
15 embarrassed, and found it very hard  
16 to go out and interact with people.  
17 I felt paranoid in a way that I was  
18 either being followed by a private  
19 investigator or photographer or  
20 something or someone else. I was  
21 afraid to run into Bob, which I had  
22 run into him twice close to my  
23 house, and I just felt I didn't feel  
24 as -- as safe going out. I really  
25 stayed where I felt safe, which was

1 G. C. ROBINSON  
2 at my home.

3 Q. So if I understand that  
4 testimony correctly, you had no  
5 concerns about your physical safety,  
6 but it was more of a psychological  
7 standpoint, is that correct?

8 A. I would probably say more  
9 that than my physical safety, but it  
10 had crossed my mind about my  
11 physical safety with the lengths of  
12 retaliation that Bob and his agents  
13 have gone to -- that he has directed  
14 them to go to.

15 Q. And his agents, who are you  
16 referring to when you say "his  
17 agents?"

18 A. People who worked on the  
19 forms of retaliation and people who  
20 --

21 Q. Specifically who?

22 A. Tom Harvey.

23 Q. Okay.

24 Anyone else?

25 A. Not that I can recall.

1 G. C. ROBINSON  
2 Q. At some point when you were  
3 in treatment with Dr. Ryan, did you  
4 face some sort of a tax audit?

5 A. Sorry. Can you repeat your  
6 question?

7 Q. In the last two years, have  
8 you been subject to any form of tax  
9 audit?

10 A. I was audited in -- I found  
11 out I was being audited in 2020.

12 Q. Did you suspect at any  
13 time, even as of today, that Mr. De  
14 Niro was behind the tax audit?

15 MS. HARWIN: Objection to  
16 the form.

17 A. I think there were a lot of  
18 forms of retaliation, and I -- I  
19 don't know if --

20 Q. Did you suspect it?

21 A. I mean, I think with all  
22 the forms of retaliation, I  
23 suspected a lot of retaliating.

24 Q. So yes?

25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
2 the form.

3 A. I believe it crossed my  
4 mind that he could have.

5 Q. Is that audit concluded at  
6 this time, or does it remain  
7 ongoing?

8 A. It was concluded.

9 Q. And what was the result of  
10 it; did you pay, was there a  
11 deficiency that was noted?

12 MS. HARWIN: Note my  
13 objection.

14 A. No, I was sent my refund.  
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1 G. C. ROBINSON  
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G. C. ROBINSON

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[REDACTED]

G. C. ROBINSON

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[REDACTED]

Q. No. That is alright.  
You resigned from Canal on April 6th, 2019, is that right?

A. Yes, that is correct.

Q. Did you look for a job after that date?

MS. HARWIN: Objection to the form.

A. Yes, I applied to jobs after I left Canal Productions.

G. C. ROBINSON

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Q. Without referring to any documents, what is your first recollection about the steps that you first took to begin looking for alternative employment after you resigned?

MS. HARWIN: Objection to the form.

A. The first steps I had taken was trying to reach out to people to find out if there were any open positions or get some advice on people that I could send my resume to. After that, I applied to two job positions.

Q. Okay.

And you looked both in the UK and the US, is that right?

A. I looked all over -- I looked all over. Not just the UK and the US.

Q. Geographically, within the United States, generally, where did you look, did you look on the East

G. C. ROBINSON

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and West Coast?

MS. HARWIN: Objection to the form.

A. I applied to jobs in New York, in Boston, in Texas, in Georgia, in San Diego, I believe, San Francisco, Los Angeles, and I believe other locations as well.

Q. Do you recall applying to any administrative assistant positions?

MS. HARWIN: Objection to the form.

A. I can't recall specific ones that I applied to. But I do know that I applied to executive assistant positions.

Q. Administrative assistant was the question?

MS. HARWIN: Objection to the form.

A. I believe I applied to jobs with administrative assistant.

1 G. C. ROBINSON  
 2 Q. I am just going to list out  
 3 a couple of titles. When I am done  
 4 I am going to ask if they sound  
 5 familiar to you in terms of  
 6 applications that you applied to for  
 7 positions, okay?  
 8 A. Yes.  
 9 Q. Senior director Warner  
 10 Brother, senior vice president of  
 11 productions Lions Gate, senior  
 12 production executive Amazon, senior  
 13 director unscripted production HBO,  
 14 creative director Hulu, director of  
 15 original programming Show Time, VP  
 16 production Master Class. I am not  
 17 asking for you to have a perfect  
 18 memory, but do these titles sound  
 19 consistent with job applications  
 20 that you submitted?  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. I don't want to speculate  
 24 on a specific job. Some of the  
 25 companies sound familiar. I can't

1 G. C. ROBINSON  
 2 recall all of the jobs or the titles  
 3 that I applied to.  
 4 Q. Do you recall when you  
 5 applied to -- well, withdrawn.  
 6 Do you recall applying to  
 7 the Juilliard School?  
 8 MS. HARWIN: Objection to  
 9 the form.  
 10 A. I have applied to almost  
 11 400 jobs. I --  
 12 Q. If you don't recall, you  
 13 don't recall. I am just wondering  
 14 if you recall applying to the  
 15 Juilliard School or not?  
 16 A. I don't --  
 17 Q. So no?  
 18 A. No, I can't recall that  
 19 specific one.  
 20 Q. Do you recall formulating  
 21 in your own mind during your job  
 22 hunt what the minimum salary  
 23 requirement would be for you to  
 24 accept the job?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 the form.  
 3 A. Could you repeat your  
 4 question?  
 5 Q. Sure.  
 6 In -- in coming up with  
 7 your strategy to decide to look for  
 8 work following your resignation from  
 9 Canal, did you come up with a salary  
 10 figure that was the floor, the  
 11 lowest that you would accept for a  
 12 new job?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. No.  
 16 Q. And when you resigned from  
 17 Canal Productions, you were making a  
 18 base of 300,000, is that right?  
 19 A. Yes.  
 20 Q. Okay.  
 21 So since your last paycheck  
 22 from Canal Productions, in April of  
 23 2019, have you had any stream or  
 24 form of income?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 the form.  
 3 A. I have not had income from  
 4 any job positions or employment.  
 5 Q. Have you had income from  
 6 any sort whatsoever?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 A. I have not had income.  
 10 Q. Okay.  
 11 How have you made ends meet  
 12 without income since 2019 in April?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. I have relied upon my  
 16 savings, and support from my family.  
 17 Q. Soon after you resigned and  
 18 you alluded to this earlier, you  
 19 heard from the New York District  
 20 Attorney's Office, is that right?  
 21 A. Yes.  
 22 Q. Okay.  
 23 And did you retain legal  
 24 counsel once you heard from the  
 25 District Attorney's Office?

1 G. C. ROBINSON  
 2 A. Yes, I did.  
 3 Q. Who did you retain?  
 4 A. Neighborhood Defender  
 5 Service of Harlem.  
 6 Q. Is that a not-for-profit  
 7 service?  
 8 A. Yes.  
 9 Q. And did you have to  
 10 compensate them in any way for their  
 11 legal representation?  
 12 A. No.  
 13 Q. Did you have to complete  
 14 any paperwork before they agreed to  
 15 represent you?  
 16 MS. HARWIN: Objection.  
 17 I would also direct the  
 18 client not to answer anything  
 19 that goes to attorney-client  
 20 privileged communications.  
 21 MR. BENNETT: Unless --  
 22 that is a good point. I will  
 23 be very clear.  
 24 Q. I am sure your counsel  
 25 already addressed this. Let me make

1 G. C. ROBINSON  
 2 it very clear, I am not intending to  
 3 ask any question designed to elicit  
 4 communications between you and your  
 5 counsel. I want to know if you  
 6 recall completing any paperwork in  
 7 connection with the Neighborhood  
 8 Defender Service?  
 9 A. I can't recall.  
 10 Q. Did anyone assist you when  
 11 you first spoke with anyone from the  
 12 Neighborhood Defender Service?  
 13 MS. HARWIN: Objection to  
 14 the form. I would also note  
 15 again to not provide any  
 16 attorney-client privilege  
 17 communication.  
 18 A. Can you clarify assist,  
 19 what you mean by assist?  
 20 Q. How did you first speak  
 21 with anyone at the Neighborhood  
 22 Defender Service, was it by phone,  
 23 or in person, or e-mail?  
 24 MS. HARWIN: Objection to  
 25 the form. I don't see how

1 G. C. ROBINSON  
 2 this doesn't encroach on  
 3 attorney-client privilege  
 4 issue.  
 5 MR. BENNETT: I am simply  
 6 looking for how it was  
 7 initiated and whether a third  
 8 party who was not an attorney  
 9 was present. That is all I  
 10 am trying to figure out.  
 11 A. There was no third party  
 12 that wasn't an attorney that was  
 13 present.  
 14 Q. That is fine. But I think  
 15 the question I am looking for is,  
 16 how did you first speak with anyone  
 17 at Neighborhood Defender Services,  
 18 by person, by phone or e-mail?  
 19 A. I believe it was by e-mail.  
 20 Q. And Jeffrey Pagano is an  
 21 attorney that you are familiar with,  
 22 is that right?  
 23 A. Yes.  
 24 Q. When did you first meet  
 25 Attorney Pagano?

1 G. C. ROBINSON  
 2 MS. HARWIN: Objection to  
 3 the form.  
 4 A. I had spoken -- I connected  
 5 with him in regards to Canal, I  
 6 believe, sometime in March.  
 7 Q. Prior to March 2019, had  
 8 you ever spoken to Attorney Pagano  
 9 before in your life?  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 A. I believe I had. I don't  
 13 recall exactly when.  
 14 Q. Was he an acquaintance of  
 15 your mom's?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. He is a family attorney.  
 19 An attorney for my mother.  
 20 Q. Okay.  
 21 Between October 2016, and  
 22 the date that you resigned from  
 23 Canal, April 6, 2019, did you look  
 24 for other employment opportunities?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 the form.  
 3 A. I am just going to clarify,  
 4 you said November of 2019?  
 5 Q. October of 2016, to April  
 6 2019?  
 7 A. Yes, I believe I did.  
 8 Q. Geographically, where were  
 9 you looking during that time period?  
 10 A. I believe New York, Los  
 11 Angeles, and the UK.  
 12 Q. Would you have used your  
 13 e-mail address to look for those  
 14 employment opportunities?  
 15 MS. HARWIN: Objection to  
 16 the form.  
 17 A. Can you clarify which  
 18 e-mail address are you speaking to?  
 19 Or are you talking about my Canal or  
 20 my personal --  
 21 Q. No, your personal [REDACTED]  
 22 address?  
 23 A. Yes, I would have used my  
 24 [REDACTED] address.  
 25 Q. Okay.

1 G. C. ROBINSON  
 2 And can you tell me what  
 3 that is, just so there is no  
 4 confusion?  
 5 [REDACTED]  
 6 Q. Did you get any offers  
 7 during that period of time?  
 8 MS. HARWIN: Objection to  
 9 the form.  
 10 A. No. I think that I would  
 11 clarify and say that I didn't apply  
 12 for specific jobs. I had been  
 13 networking. Looking for work.  
 14 Q. Okay.  
 15 Do you recall with whom you  
 16 were networking?  
 17 A. I don't recall off the top  
 18 of my head from the 16th to the 2019  
 19 -- sorry, 2016 to 2019.  
 20 Q. Between April 6, 2019, and  
 21 March 15, 2020, did you leave New  
 22 York State?  
 23 A. Can you repeat that?  
 24 Sorry.  
 25 Q. That is okay.

1 G. C. ROBINSON  
 2 April 6, 2019, to March 15,  
 3 2020?  
 4 A. Did I leave New York State?  
 5 Yes.  
 6 Q. When was the first date  
 7 that you left New York?  
 8 MS. HARWIN: Objection to  
 9 the form.  
 10 A. I can't recall the specific  
 11 date.  
 12 Q. Well, you resigned on April  
 13 6, 2019, right?  
 14 A. Yes.  
 15 Q. Did you --  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 Q. Did -- did you go on a trip  
 19 within a month?  
 20 MS. HARWIN: Objection to  
 21 the form.  
 22 A. I believe.  
 23 Q. Where did you go?  
 24 A. Los Angeles.  
 25 Q. Where did you stay, hotel?

1 G. C. ROBINSON  
 2 A. No.  
 3 Q. Where did you stay?  
 4 A. I stayed with Amelia Brain,  
 5 who was a former employee of Canal.  
 6 Q. Yes. We will get there in  
 7 a moment.  
 8 How long did you stay with  
 9 Ms. Brain during that trip?  
 10 A. A couple of days I believe.  
 11 I can't recall the specific number.  
 12 Q. And what was the purpose of  
 13 that trip?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. I can't recall the -- the  
 17 purpose.  
 18 Q. Was it personal or was it  
 19 professional?  
 20 A. I believe it was both. It  
 21 was networking a little bit, but  
 22 also personal.  
 23 Q. Okay.  
 24 When did you book that  
 25 trip?

1 G. C. ROBINSON  
 2 A. I can't recall exactly when  
 3 I booked the trip.  
 4 Q. Did you fly?  
 5 A. Yes.  
 6 Q. What airline?  
 7 A. Delta.  
 8 Q. Okay.  
 9 After that, you returned to  
 10 your apartment in New York City, is  
 11 that right?  
 12 A. Yes.  
 13 Q. Okay.  
 14 So if -- roughly we are  
 15 still in May of 2019, is that fair?  
 16 A. Yes.  
 17 Q. Okay.  
 18 From May of 2019 forward,  
 19 what is your next trip?  
 20 MS. HARWIN: Objection to  
 21 the form.  
 22 A. I can't recall what my next  
 23 trip was after that.  
 24 Q. Are there any records that  
 25 you could refer to that would

1 G. C. ROBINSON  
 2 refresh your recollection as to the  
 3 trips that you took between April 6,  
 4 2019 and March 15, 2020?  
 5 A. Not -- not on me.  
 6 Q. I understand that.  
 7 But what documents would  
 8 you look at to refresh your  
 9 recollection?  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 A. Records would include my  
 13 flight, my tickets.  
 14 Q. So do you recall again,  
 15 April 6, 2019, to March 15, 2020, do  
 16 you recall going to Spain?  
 17 A. Yes.  
 18 Q. How many times?  
 19 A. I believe it was once.  
 20 Q. Where did you stay?  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. A hotel.  
 24 Q. Do you recall the hotel, is  
 25 it the Four Seasons?

1 G. C. ROBINSON  
 2 A. No.  
 3 Q. Do you recall the hotel?  
 4 A. I can't recall the name of  
 5 the hotel.  
 6 Q. Okay.  
 7 Aside from Spain, did you  
 8 go to London?  
 9 MS. HARWIN: Objection to  
 10 the form.  
 11 A. I can't recall what month,  
 12 but I did go to London.  
 13 Q. How many times did you go  
 14 to London between those time  
 15 periods?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. I believe I stayed in  
 19 London one time.  
 20 Q. And did you go to LA again  
 21 or -- within that timeframe?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. I can't recall specifically  
 25 the dates, but I went to LA one more

1 G. C. ROBINSON  
 2 time.  
 3 Q. Do you recall where you  
 4 stayed when you went to LA on that  
 5 occasion?  
 6 A. I stayed at, I believe, the  
 7 Four Seasons with my mother.  
 8 Q. So for the two LA trips,  
 9 the one to Spain, the one to the UK,  
 10 you flew to all four of those  
 11 locations, correct?  
 12 A. To LA, to Spain, to UK,  
 13 yes.  
 14 Q. Three locations on four  
 15 occasions, correct?  
 16 A. Yes.  
 17 Q. And you used Delta for each  
 18 flight or a different airline?  
 19 A. I used Delta.  
 20 Q. And do you recall if you  
 21 booked any of those trips after  
 22 April 6, 2019?  
 23 MS. HARWIN: Objection to  
 24 the form.  
 25 A. Yes, some of them -- most



1 G. C. ROBINSON  
 2 of them were trips that I discussed  
 3 with -- with Bob, while I was still  
 4 at Canal.  
 5 Q. The answer was yes, if I  
 6 understood?  
 7 A. Yes.  
 8 Q. Okay.  
 9 Ms. Brain, you mentioned  
 10 her recently. When is the last time  
 11 you spoke to her?  
 12 A. I can't recall the last  
 13 time I spoke to her.  
 14 Q. Have you ever spoken to her  
 15 in 2021?  
 16 A. I don't recall we  
 17 communicated in 2021.  
 18 Q. Lu Lu or Lu Lu White,  
 19 Louisa I believe was her full name,  
 20 but you know her as Lu Lu, is that  
 21 right?  
 22 A. Yes.  
 23 Q. Have you spoken to her in  
 24 2021?  
 25 A. No.

1 G. C. ROBINSON  
 2 Q. Do you recall speaking with  
 3 her before March 15, 2020,  
 4 withdrawn.  
 5 Do you recall speaking with  
 6 her after March 15, 2020?  
 7 A. After March 15th, 2020?  
 8 Q. Yes.  
 9 A. I can't recall the last  
 10 time I spoke to Lu Lu White.  
 11 MR. BENNETT: I am going  
 12 to -- counsel, I am going to  
 13 send the first exhibit  
 14 around.  
 15 Q. Ms. Robinson, you have  
 16 access to e-mail, I assume?  
 17 A. My applications aren't  
 18 open, but yes.  
 19 MR. BENNETT: I will send  
 20 it to you and you forward it  
 21 on to your client however you  
 22 would like.  
 23 MS. HARWIN: One thing  
 24 Greg that I believe you could  
 25 do is you could drop a

1 G. C. ROBINSON  
 2 document into the chat so if  
 3 you would like Ms. Robinson  
 4 to open a document without  
 5 the need for opening an  
 6 e-mail application that could  
 7 be a way to do that.  
 8 A. Can we take a quick break?  
 9 Q. Sure. Yes.  
 10 We will come back at 2:20  
 11 if that is okay?  
 12 A. That is perfect.  
 13 (Whereupon, a recess was  
 14 taken at this time.)  
 15 Q. Ms. Robinson, so off the  
 16 record we circulated the first  
 17 exhibit, and I think we are going to  
 18 refer to this as Exhibit A. I  
 19 believe your counsel has sent it to  
 20 you through e-mail as well. If you  
 21 can do whatever you need to do to  
 22 open the e-mail and open the  
 23 attachment, I would appreciate it.  
 24 (Whereupon, ROBINSON  
 25 Exhibit A, a three-page PDF

1 G. C. ROBINSON  
 2 document that was filed in  
 3 the New York State Action as  
 4 document number 10, was  
 5 marked for identification, as  
 6 of this date.)  
 7 MR. BENNETT: While Ms.  
 8 Robinson is doing that, I am  
 9 going to describe what the  
 10 document is for the record.  
 11 It is a three-page PDF  
 12 document that was filed in  
 13 the New York State Action as  
 14 document number 10.  
 15 A. I see Exhibit D and Exhibit  
 16 E 191213.  
 17 Q. Sorry. Just give me a  
 18 moment, please. It says, "A1319?"  
 19 A. The top of it says, "81319"  
 20 and in it it has book marks of --  
 21 Q. I see that, too. I don't  
 22 know where that comes from to be  
 23 honest. So I am going to direct  
 24 your attention to -- to the  
 25 three-page document. I am going to

1 G. C. ROBINSON  
 2 direct your attention to the bottom  
 3 of page one, and I am going to  
 4 describe it for you, and we will go  
 5 down to the second page. It as an  
 6 e-mail from Jeffery Pagano to  
 7 Laurent Drogin, dated August 13,  
 8 2019, at 2:53 p.m.  
 9 Do you see that?  
 10 A. Yes.  
 11 Q. At the time, August 13,  
 12 2019, tell me if I am wrong,  
 13 Attorney Pagano was representing  
 14 you, correct?  
 15 A. August 2019?  
 16 Q. Yes.  
 17 A. Yes.  
 18 Q. Okay.  
 19 Now if you go to the second  
 20 page, I am going to direct your  
 21 attention to the paragraph that  
 22 starts with, "We recognize."  
 23 Do you see that on the  
 24 second page?  
 25 A. Yes, I do.

1 G. C. ROBINSON  
 2 same paragraph, the next sentence  
 3 which begins with "Unfortunately,"  
 4 do you see that?  
 5 A. Yes.  
 6 Q. If you can, just please  
 7 read that sentence to yourself, and  
 8 I will ask you a question when you  
 9 completed it.  
 10 A. (Witness complies.)  
 11 Okay.  
 12 Q. Do you agree with that  
 13 sentence?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. I agree with that sentence,  
 17 but would also add that my future  
 18 had been -- because of this has been  
 19 destroyed. My ability to obtain  
 20 work has been destroyed, my  
 21 reputation has been destroyed  
 22 because of the false accusations and  
 23 statements and retaliatory lawsuit.  
 24 Q. I just wanted to know if  
 25 you agreed with the sentence. That

1 G. C. ROBINSON  
 2 Q. Within that paragraph, if  
 3 you look sort of in the middle and  
 4 it is going to be seven -- six lines  
 5 down, and it is a sentence that  
 6 begins with "On the other hand."  
 7 A. Okay. Yes, I see that.  
 8 Q. If you can, just read that  
 9 sentence to yourself and I am going  
 10 to ask you a question.  
 11 A. (Witness complies).  
 12 Okay.  
 13 Q. Do you have any plans to  
 14 write a book about your experience  
 15 working with Mr. De Niro?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. No.  
 19 Q. Have you spoken with anyone  
 20 about that?  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. No. Not that I can recall.  
 24 Q. Okay.  
 25 And then if you can, in the

1 G. C. ROBINSON  
 2 is it.  
 3 A. Yes, and I added. I added  
 4 to it.  
 5 Q. So did you -- do you agree  
 6 with the accuracy of that sentence?  
 7 A. Yes, at the time I did, but  
 8 I -- in addition I added to --  
 9 Q. Okay.  
 10 A. It.  
 11 Q. You added what you added.  
 12 The record will reflect what you  
 13 added.  
 14 In the complaints that you  
 15 filed in this action you cite to  
 16 certain reputational damages, right?  
 17 A. Yes.  
 18 Q. Okay.  
 19 Beyond what we just talked  
 20 about, how has your reputation been  
 21 damaged specifically?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. There are many ways that my  
 25 reputation has been damaged by Bob's

1 G. C. ROBINSON  
2 retaliatory lawsuit, the false  
3 allegations that were meant to  
4 humiliate me, ruin me.

5 Q. Have you spoken to anyone  
6 about prospective employment who has  
7 referred to this lawsuit?

8 MS. HARWIN: Objection to  
9 the form.

10 A. Can you clarify in what way  
11 they would have -- what way --

12 Q. Sure.

13 Have you spoken with anyone  
14 about prospective employment,  
15 following April 6, 2019, which has  
16 -- who has referred to Canal's State  
17 Court against you, or your  
18 commencement of this action against  
19 Mr. De Niro?

20 MS. HARWIN: Objection to  
21 the form.

22 A. I can't recall a specific  
23 conversation with some -- with  
24 somebody that I was applying for a  
25 job about this lawsuit, or Canal, or

1 G. C. ROBINSON  
2 my lawsuit.

3 Q. Thank you.

4 MR. BENNETT: I sent the  
5 second exhibit, which Paige  
6 will eventually mark as  
7 Defendant's Exhibit B.

8 (Whereupon, ROBINSON  
9 Exhibit B, a seven-page PDF  
10 starting with Bates stamped  
11 Robinson 5114, was marked for  
12 identification, as of this  
13 date.)

14 Q. Ms. Robinson, if you could  
15 please open it up when you get it  
16 and I will direct you to a  
17 particular aspect of it.

18 MS. HARWIN: It has now  
19 been sent.

20 THE WITNESS: I will let  
21 you know when I receive it.

22 MR. BENNETT: Thank you.

23 A. I have it opened.

24 Q. Great.

25 If you can, just open it,

1 G. C. ROBINSON  
2 and I am going to describe for the  
3 record.

4 MR. BENNETT: It is a  
5 seven-page PDF. The first  
6 page is Bates Stamped  
7 Robinson 5114.

8 Q. When you open it, I would  
9 like to direct your attention to the  
10 top e-mail from you to Anne Barkley.  
11 Let me know if you see that?

12 A. Yes.

13 Q. You see where it says,  
14 "Saturday, May 11, 2019?"

15 A. May 11, 2019, yes.

16 Q. So it is about a month  
17 after you resigned, correct?

18 A. Yes.

19 Q. If you look at the second  
20 paragraph of that e-mail, read that  
21 to yourself, please, it begins with  
22 "I am in the process of?"

23 A. Uh-huh.

24 Q. Do you see that?

25 A. Yes.

1 G. C. ROBINSON  
2 Q. It refers to you quote,  
3 "Working on a few development  
4 projects I have been writing and  
5 putting together."

6 Do you see that?

7 A. Yes.

8 Q. What does that refer to?

9 MS. HARWIN: Objection to  
10 the form.

11 A. When I left Canal  
12 Productions, my plan was to apply to  
13 business school for my MBA, and in  
14 addition start my own production  
15 company. Development projects are  
16 -- were a part of what I was  
17 planning on doing with my production  
18 company.

19 Q. What does that mean,  
20 development projects?

21 A. Development projects --

22 MS. HARWIN: Objection to  
23 the form.

24 A. Development projects are  
25 things that I have researched or

1 G. C. ROBINSON  
2 scripts that I wanted to write,  
3 whether they were projects that were  
4 documentaries that I had to  
5 research. It is just about putting  
6 scripts together and developing  
7 them. Ideas. That is what I was  
8 planning on doing starting a  
9 production company.

10 Q. Documentaries?

11 A. There were different types  
12 of projects that I was looking to  
13 possibly do.

14 Q. Did you begin any of that  
15 work on these development projects  
16 before April 6, 2019?

17 MS. HARWIN: Objection to  
18 the form.

19 A. Yes.

20 Q. When did you start working  
21 on development projects?

22 MS. HARWIN: Objection to  
23 the form.

24 Q. During your employment with  
25 Canal?

1 G. C. ROBINSON

2 MS. HARWIN: Objection to  
3 the form.

4 A. I wouldn't characterize  
5 them as development projects.

6 Q. Okay.

7 I think -- well, it was  
8 your answer I was going off of.

9 What would you characterize  
10 it as?

11 A. Writing. I have always,  
12 like other employees, whether it was  
13 Michael Weber or Michael Kaplan, I  
14 write. I like writing.

15 Q. When did you begin writing  
16 anything that you would ultimately  
17 use in any of the development  
18 projects that you would use that you  
19 referred to in this May 2019 e-mail?

20 MS. HARWIN: Objection to  
21 the form.

22 A. I can't recall the exact  
23 date. I believe one of them was  
24 written after college that I was  
25 revising. There was another one

1 G. C. ROBINSON  
2 that I had done a little bit of  
3 writing on here and there when I had  
4 time. But it really wasn't in any  
5 sort of phase of development just  
6 because I didn't have any personal  
7 time to work on it.

8 Q. Okay.

9 If you can refer to pages  
10 two through seven of Defendant's  
11 Exhibit B.

12 A. You said two through seven?

13 Q. Yes.

14 A. Okay. I am on two. Page  
15 two.

16 MS. HARWIN: I will note  
17 for the record that we object  
18 to the presentation of this  
19 exhibit which seems to be  
20 multiple separate documents  
21 that seem to be spliced  
22 together in one PDF.

23 MR. BENNETT: There is a  
24 reason for that, but, yes.  
25 It was because of how it was

1 G. C. ROBINSON  
2 produced.

3 MR. DROGIN: So the  
4 objection is overruled.

5 A. What am I specifically  
6 looking at?

7 Q. Did you -- did you review  
8 pages two through seven?

9 A. Okay. Okay.

10 Q. Who is Brian Zach?

11 A. Brian is a friend of mine.

12 Q. Does he live in New Canaan?

13 A. No.

14 Q. Does -- is he a friend or a  
15 romantic -- something more than a  
16 friend?

17 MS. HARWIN: Objection to  
18 the form.

19 A. He is a friend.

20 Q. Okay.

21 You can close -- actually,  
22 sorry, with respect to the text that  
23 you just reviewed between you and  
24 Brian Zach, do you recall when you  
25 retained or first met with Sanford

1 G. C. ROBINSON  
 2 Heisler? I am not asking for  
 3 anything that you discussed with  
 4 them but a date?  
 5 MS. HARWIN: Objection to  
 6 the form.  
 7 A. I can't recall.  
 8 Q. You can close that out.  
 9 MR. BENNETT: I am going  
 10 to circulate another exhibit.  
 11 You can send that over to  
 12 your client. We are now  
 13 going to get into the exhibit  
 14 this second.  
 15 Q. Ms. Robinson, you commenced  
 16 employment with Canal in 2008, is  
 17 that correct?  
 18 A. I started my employment  
 19 with Canal in 2008.  
 20 Q. When you started with  
 21 Canal, what type of business was it?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. I don't know specifically  
 25 what type of business or -- Canal

1 G. C. ROBINSON  
 2 was.  
 3 Q. What type of services did  
 4 Canal offer?  
 5 MS. HARWIN: Objection to  
 6 the form.  
 7 A. Services related to Bob, to  
 8 his businesses, his personal life, I  
 9 --  
 10 Q. Would you agree that Canal  
 11 was a loan out company for the  
 12 acting services of Robert De Niro?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. I don't know if I would  
 16 characterize it that way. I think  
 17 that it was -- I think that did --  
 18 Q. Let me try to clarify the  
 19 question for you, Ms. Robinson.  
 20 Did Mr. De Niro offer his  
 21 acting services through Canal, even  
 22 though Canal might have done other  
 23 things?  
 24 MS. HARWIN: Objection to  
 25 the form.

1 G. C. ROBINSON  
 2 A. I believe at times it did.  
 3 Q. Okay.  
 4 Canal was Mr. De Niro, and  
 5 Mr. De Niro was Canal, would you  
 6 agree with that?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 A. Yes, it was Bob's business  
 10 and personal.  
 11 Q. What led you to first start  
 12 looking for employment with Canal?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. I did not look for  
 16 employment with Canal productions.  
 17 Q. What led you to Canal?  
 18 A. My -- I received an e-mail  
 19 from Megan Livers (ph) who worked  
 20 for Jane Rosenfeld (ph) asking if I  
 21 - if she could forward my resume on  
 22 for on open position as an executive  
 23 assistant to Bob. I said, "yes,"  
 24 and my resume was forwarded on.  
 25 Q. Do you recall ever learning

1 G. C. ROBINSON  
 2 who you were replacing specifically,  
 3 or who it was contemplated that you  
 4 might replace?  
 5 MS. HARWIN: Objection to  
 6 the form.  
 7 A. Yes.  
 8 Q. Who?  
 9 A. I was interviewed by Lauren  
 10 Hertz, Bob's executive assistant at  
 11 the time to replace her as she was  
 12 leaving.  
 13 Q. Was there somebody employed  
 14 there by the name of Andrea Cutter  
 15 (ph)?  
 16 A. Not at the time.  
 17 Q. Okay.  
 18 Before Canal extended an  
 19 offer of employment to you, did you  
 20 meet with anyone, go through  
 21 interviews?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. Yes.  
 25 Q. Who did you meet with?

1 G. C. ROBINSON  
 2 A. I met with the executive  
 3 assistants, Lauren Hertz, Jessie  
 4 Spellman (ph), and Michael Kaplan,  
 5 and I believe I also met with  
 6 Michael Weber.  
 7 Q. Did you meet with Bob?  
 8 A. I met with Bob, and in  
 9 addition, I also met with [REDACTED]  
 10 [REDACTED] who signed off on -- on me  
 11 being hired.  
 12 Q. Did you interview with Jane  
 13 Rosenthal (ph)?  
 14 A. I had met with her, I  
 15 believe, in -- I had met with her,  
 16 but not in connection with the  
 17 position at Canal Productions.  
 18 Q. What was it in connection  
 19 with?  
 20 A. A possible job at Tribeca  
 21 in the -- in film production.  
 22 Q. And that was before the  
 23 offer from Canal Productions was  
 24 extended to you?  
 25 A. Yes.

1 G. C. ROBINSON  
 2 Q. So ballpark, you are around  
 3 25 years of age when you start  
 4 working with Canal, is that fair?  
 5 A. Yes, I believe so.  
 6 Q. Okay.  
 7 You are working with Mr. De  
 8 Niro, one of the most well-known  
 9 actores in history, right?  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 A. I worked for Bob.  
 13 Q. Okay.  
 14 Did -- in light of your  
 15 minor at St. Lawrence, was it  
 16 exciting for you, with the prospect  
 17 of working alongside Mr. De Niro?  
 18 MS. HARWIN: Objection to  
 19 the form.  
 20 A. I was excited to continue  
 21 or to start a foundation for my  
 22 career in -- in working in the  
 23 entertainment industry and film.  
 24 Q. I don't want to interrupt  
 25 you. Are you done?

1 G. C. ROBINSON  
 2 A. Yeah.  
 3 Q. Okay.  
 4 So the fact that you were  
 5 working alongside Mr. De Niro didn't  
 6 mean anything?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 A. I wouldn't characterize it  
 10 that way. I think that I just -- I  
 11 wouldn't characterize it that way.  
 12 Q. How would you characterize  
 13 it?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. I think -- I think with the  
 17 job with Bob and being in the  
 18 entertainment industry, I was  
 19 excited about the start of my career  
 20 in the film industry. It  
 21 incorporated not only working for  
 22 somebody in the film industry, but  
 23 also working in that industry.  
 24 Q. Did you supervise anyone  
 25 during your first year on the job?

1 G. C. ROBINSON  
 2 MS. HARWIN: Objection to  
 3 the form.  
 4 A. Not that I am aware of.  
 5 Q. What were your job  
 6 responsibilities?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 Q. Withdrawn.  
 10 During the first year you  
 11 were employed by Canal, what were  
 12 your job responsibilities?  
 13 A. My job responsibilities  
 14 included handling Bob's schedule,  
 15 messages, a birthday list in and  
 16 picking out gifts, very large  
 17 Christmas gifts and picking out  
 18 gifts.  
 19 In addition, there was a  
 20 portion of being on call for Bob  
 21 which -- I mean, handling other sort  
 22 of personal items for him. Whatever  
 23 he asked or directed me to do is  
 24 what I did.  
 25 Q. You started off with an



1 G. C. ROBINSON  
 2 annual salary of 95,000, is that  
 3 correct?  
 4 A. I don't believe that is  
 5 correct.  
 6 Q. What do you think it  
 7 started out as?  
 8 MS. HARWIN: Objection to  
 9 the form.  
 10 A. I can't recall what exactly  
 11 my starting salary was.  
 12 Q. Okay.  
 13 Between the first day that  
 14 you started with Canal, and October  
 15 of 2012, where did you physically  
 16 perform the job?  
 17 MS. HARWIN: Objection to  
 18 the form.  
 19 A. From -- I need to clarify,  
 20 from the beginning when I started in  
 21 February 2008 to October of 2013?  
 22 Q. 2012?  
 23 A. Oh, 2012. Mainly the  
 24 office at Canal Productions, but  
 25 there were additional times because

1 G. C. ROBINSON  
 2 I was Bob's only executive assistant  
 3 for much of that time, I worked  
 4 while I was away as well. So there  
 5 were times where I worked while I  
 6 was away in LA or other locations.  
 7 I can't recall exactly during those  
 8 dates where I would have  
 9 additionally been working from.  
 10 Q. Okay.  
 11 Do you know when Dan Harvey  
 12 commenced employment with Canal?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. No.  
 16 Q. Do you know when Kaplan  
 17 commenced employment with Canal?  
 18 MS. HARWIN: Objection to  
 19 the form.  
 20 A. I don't know when Michael  
 21 Kaplan started at Canal.  
 22 Q. Did Mr. Kaplan supervise  
 23 you when you began working for  
 24 Canal?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 the form.  
 3 A. Yes. In -- in some ways,  
 4 he did.  
 5 Q. In what ways?  
 6 A. He, like Jesse Spellman  
 7 (ph) and Michael Weber were senior  
 8 to me, and they would direct me on  
 9 how things were handled or done.  
 10 That is what comes to mind at this  
 11 moment.  
 12 Q. Okay. There is a new  
 13 exhibit. If you could just open it,  
 14 please.  
 15 MR. BENNETT: For the  
 16 record it is a PDF, 20 pages.  
 17 The file name is P13908.  
 18 (Whereupon, ROBINSON  
 19 Exhibit C, a 20-page PDF,  
 20 file name P13908, was marked  
 21 for identification, as of  
 22 this date.)  
 23 MS. HARWIN: If we could  
 24 take a one-minute bathroom  
 25 break while Ms. Robinson is

1 G. C. ROBINSON  
 2 opening the exhibit.  
 3 MR. BENNETT: Yeah. That  
 4 is fine.  
 5 MS. HARWIN: One minute.  
 6 (Whereupon, a recess was  
 7 taken at this time.)  
 8 Q. Did you see that new file?  
 9 A. I did. It is quite -- it  
 10 is a lot of pages. 20. Is there  
 11 something that you would like to  
 12 direct me to?  
 13 Q. Absolutely. We are going  
 14 to look at pages one and two. So  
 15 specifically I would like you to  
 16 look at the bottom of page one. It  
 17 is an e-mail, dated April 8, 2011,  
 18 at 11:05 a.m., from you to Bosswick.  
 19 Do you see that?  
 20 A. Yes.  
 21 Q. And if you -- I am going to  
 22 direct your attention to the third  
 23 paragraph which starts with, "As for  
 24 me."  
 25 Do you see that?



1 G. C. ROBINSON  
 2 A. Yes.  
 3 Q. And just read that whole  
 4 paragraph to yourself, please.  
 5 A. (Witness complies).  
 6 Yes, I read it.  
 7 Q. What was the change to your  
 8 title that you are referring to  
 9 here?  
 10 A. My title was changed to  
 11 director of production.  
 12 Q. Why was it changed?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. I had spoken to Bob,  
 16 probably starting in 2010, about  
 17 wanting to focus my career on film  
 18 production, and he and I had  
 19 multiple discussions on that I could  
 20 continue my career at Canal and  
 21 Tribeca working on film production  
 22 instead of moving on from being his  
 23 executive assistant.  
 24 Q. Did Canal produce films?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 the form.  
 3 A. Bob produced them through  
 4 Tribeca Productions.  
 5 Q. But Canal did not, correct?  
 6 MS. HARWIN: Objection to  
 7 the form.  
 8 A. I can't recall if they were  
 9 ever listed as a company that  
 10 produced films.  
 11 Q. Okay.  
 12 So your title was being  
 13 changed following, and that was in  
 14 response to the conversation that  
 15 you just explained to me with Mr. De  
 16 Niro, correct?  
 17 A. Yes. We had multiple  
 18 conversations about it.  
 19 Q. And if you look down at the  
 20 paragraph below that, it starts with  
 21 "We will also be looking."  
 22 Do you see that?  
 23 A. Yes.  
 24 Q. It refers to hiring an  
 25 assistant, correct?

1 G. C. ROBINSON  
 2 A. Yes.  
 3 Q. Now Amelia started in  
 4 February of 2012, does that sound  
 5 right to you?  
 6 MS. HARWIN: Objection to  
 7 the form.  
 8 A. I can't recall when she  
 9 started at Canal Productions.  
 10 Q. Do you know who you are  
 11 referring to here when you say that  
 12 you are looking to hire an assistant  
 13 this summer?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. I believe it is in  
 17 reference to finding an assistant to  
 18 replace me.  
 19 Q. To replace you?  
 20 A. Yes.  
 21 Q. So you are informing Mr.  
 22 Bosswick that your title is being  
 23 changed to director of production,  
 24 and then in the same communication  
 25 explaining to him that you are

1 G. C. ROBINSON  
 2 leaving?  
 3 MS. HARWIN: Objection to  
 4 the form.  
 5 A. No, that is not correct.  
 6 Q. So you were an assistant at  
 7 the time, you were moved up to  
 8 director of production, and you are  
 9 hiring an assistant to replace your  
 10 old position, is that correct?  
 11 MS. HARWIN: Objection to  
 12 the form.  
 13 A. I believe it is in  
 14 reference of replacing the -- since  
 15 I was moving up to director of  
 16 production and handling production  
 17 items, which is what Bob and I  
 18 discussed, we were replacing -- or  
 19 Canal and Bob were replacing the  
 20 executive assistant position. And  
 21 that is what that is in reference  
 22 to.  
 23 Q. Okay.  
 24 While you might not recall  
 25 the specific date or month, does it

1 G. C. ROBINSON  
 2 sound right that Amelia was hired in  
 3 2012?  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 A. Again, I can't recall  
 7 exactly when Amelia Brain was hired.  
 8 Q. I am not asking for  
 9 exactly. I am just looking for the  
 10 year. Does 2012 sound right?  
 11 MS. HARWIN: Objection to  
 12 the form.  
 13 A. No, I don't believe that  
 14 sounds correct.  
 15 Q. Whenever Ms. Brain was  
 16 hired, why was she hired?  
 17 MS. HARWIN: Objection to  
 18 the form.  
 19 A. From what I can recall, she  
 20 was hired to help out the office.  
 21 She began working hours here and  
 22 there while she was also working for  
 23 the Tribeca Grill, and I believe her  
 24 hours continued to increase. I  
 25 don't know exactly when she was

1 G. C. ROBINSON  
 2 specifically hired at Canal  
 3 Productions.  
 4 Q. At some point she comes on  
 5 to Canal in a full-time capacity, is  
 6 that right?  
 7 A. Yes.  
 8 Q. When it came to the  
 9 decision to extend a salary to Ms.  
 10 Brain for her full-time position,  
 11 how was the salary determination  
 12 arrived at?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. I can't exactly recall  
 16 except that any salaries or amounts  
 17 were approved by -- by Bob.  
 18 Q. Right. Would you have had  
 19 that conversation with Mr. De Niro  
 20 or someone else?  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. I can't recall a specific  
 24 conversation with him.  
 25 Q. When Amelia Brain came on

1 G. C. ROBINSON  
 2 to work at Canal, did you or Mr.  
 3 Kaplan have the authority to make an  
 4 offer of employment to a prospective  
 5 new hire without consulting with Mr.  
 6 De Niro?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 A. No. Bob would have to have  
 10 approval for hiring of employees at  
 11 Canal Productions.  
 12 Q. Did you interview Ms.  
 13 Brain?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. I can't recall ever  
 17 interviewing Amelia Brain.  
 18 Q. Once Amelia starts working  
 19 with Canal, did you supervise her?  
 20 MS. HARWIN: Objection to  
 21 the form.  
 22 A. I believe at times there  
 23 were things where I passed along  
 24 what Bob wanted to do, same as  
 25 Michael Kaplan. She helped out the

1 G. C. ROBINSON  
 2 office with miscellaneous random  
 3 things and when Bob asked for work  
 4 to be done.  
 5 Q. So the answer to the  
 6 question is yes I think?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 Q. You did supervise her?  
 10 A. I mean, at times -- at  
 11 times, but it wasn't something that  
 12 was consistent. The job itself was  
 13 again what Bob needed or what Bob  
 14 wanted done. And at times I would  
 15 be a middleman passing along, you  
 16 know, what Bob wanted.  
 17 Q. Okay.  
 18 Do you recall who assigned  
 19 her work duties?  
 20 MS. HARWIN: Objection to  
 21 the form.  
 22 A. I think that we all had a  
 23 team effort in trying to get  
 24 everything done for what Bob was  
 25 requesting and directing to be done.

1 G. C. ROBINSON  
 2 Q. Who are you referring to,  
 3 when you say, "team effort"?  
 4 A. Team effort, myself,  
 5 Michael Kaplan, Amelia, people who  
 6 were in the office.  
 7 Q. Right. So the question was  
 8 focused on who is assigning work  
 9 duties to Ms. Brain. She is not  
 10 assigning work duties to herself.  
 11 Is it you and Mr. Kaplan  
 12 who is referring work duties to her,  
 13 or is it someone else?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. It was a combination of  
 17 Bob, [REDACTED] There were things that  
 18 I passed along that needed to be  
 19 done for Bob, same with Michael  
 20 Kaplan, to Amelia. It was just work  
 21 that needed to be done. I don't  
 22 know how it was distributed or how  
 23 each specific task was -- there were  
 24 --  
 25 Q. Did you ever evaluate or

1 G. C. ROBINSON  
 2 provide constructive feedback to her  
 3 regarding her performance?  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 A. Can repeat the question?  
 7 Sorry.  
 8 Q. When it comes to Ms.  
 9 Brain's performance of her work  
 10 duties, did you ever evaluate her or  
 11 provide constructive feedback about  
 12 it?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. No. I can't recall a time  
 16 when I did.  
 17 Q. Did you ever provide her  
 18 with information about compensation  
 19 issues?  
 20 MS. HARWIN: Objection to  
 21 the form.  
 22 A. Can you clarify  
 23 compensations issues?  
 24 Q. Anything affecting her pay,  
 25 benefits or pay?

1 G. C. ROBINSON  
 2 A. Not that I can recall.  
 3 Q. Who did?  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 A. Can you clarify who did  
 7 what?  
 8 Q. Sure.  
 9 I am just trying to  
 10 understand. Ms. Brain comes on  
 11 working as an executive assistant  
 12 working for Canal, correct?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. No, I wouldn't characterize  
 16 it that way. She was an assistant  
 17 to the office at Canal Productions.  
 18 She wasn't an executive position to  
 19 Bob.  
 20 Q. She comes in, she starts  
 21 performing work, correct?  
 22 A. Yes.  
 23 Q. As far as you are aware,  
 24 how does she know what she is  
 25 earning?

1 G. C. ROBINSON  
 2 MS. HARWIN: Objection to  
 3 the form.  
 4 A. I can't recall how she  
 5 would have known how she was -- what  
 6 she was earning. I am -- I know  
 7 that in the beginning of her  
 8 employment she would send the hours  
 9 that she had worked, and they would  
 10 be sent to Burton to be paid for the  
 11 hours that she worked.  
 12 Q. As far as you recall, she  
 13 sent e-mails directly to Burton?  
 14 A. I believe she either sent  
 15 them to me and Michael, or just me  
 16 and I would forward them to Burton  
 17 in the beginning of her employment.  
 18 Q. Did Amelia perform any type  
 19 of personal duties or work  
 20 responsibilities for [REDACTED] or Bob?  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. Yes.  
 24 Q. Did you ever provide Amelia  
 25 with any information about

1 G. C. ROBINSON  
2 vacations, holidays or office  
3 closures?  
4 A. At times --  
5 MS. HARWIN: Objection to  
6 the form.  
7 A. At times, I believe, I did.  
8 Q. Okay.  
9 And other times, are you  
10 aware of anyone else who did?  
11 MS. HARWIN: Objection to  
12 the form.  
13 A. We received e-mails from  
14 Tribeca HR with the office closures.  
15 Q. Okay.  
16 Do you ever recall --  
17 withdrawn.  
18 We can refer to page three  
19 of that same exhibit, please. This  
20 is an e-mail at the top. Just let  
21 me know when you see it. It is  
22 dated September 13, 2012, at 7:55  
23 a.m.  
24 Do you see that?  
25 A. Yes.

1 G. C. ROBINSON  
2 should go up to 190, among  
3 perhaps other things, is that  
4 fair?)  
5 MS. HARWIN: Objection to  
6 the form.  
7 A. In this conversation, we  
8 had been discussing a raise -- the  
9 conversation about a raise and  
10 bonus.  
11 Q. And the raise would be up  
12 to 190, correct?  
13 MS. HARWIN: Objection to  
14 the form.  
15 A. In this specific e-mail I  
16 believe so.  
17 Q. I am not referring to any  
18 other e-mail. That is my point. If  
19 we can try to confine your answers  
20 to the questions that I am asking,  
21 this will go faster. This is the  
22 one we are looking at right now.  
23 Okay?  
24 If you can please, I would  
25 like you to look at the paragraph

1 G. C. ROBINSON  
2 Q. If you can, please just  
3 review the e-mail to yourself, and I  
4 am going to ask you some questions.  
5 A. (Witness complies).  
6 I have read it.  
7 Q. So tell me if I am wrong.  
8 In this e-mail you are trying to  
9 explain to Mr. De Niro why your  
10 salary should go up to 190, among  
11 perhaps other things, is that fair?  
12 MS. HARWIN: Objection to  
13 the form.  
14 A. We had been in discussion  
15 about a raise.  
16 Q. Okay.  
17 MR. BENNETT: Can you  
18 read the question back?  
19 (Whereupon, the requested  
20 portion was read back by the  
21 reporter:  
22 Q: So tell me if I am  
23 wrong. In this e-mail you  
24 are trying to explain to Mr.  
25 De Niro why your salary

1 G. C. ROBINSON  
2 that begins with "In the office."  
3 Do you see that?  
4 A. Yes, I see that.  
5 Q. And it seems to be that you  
6 are explaining to Mr. De Niro why  
7 you don't think giving out  
8 performance-based bonuses is a good  
9 idea for yourself or Canal  
10 personnel, correct?  
11 MS. HARWIN: Objection to  
12 form.  
13 A. Yes.  
14 Q. Okay.  
15 And in this -- if you look  
16 at -- I don't know what sentence it  
17 is. It starts with, "In the case of  
18 Michael."  
19 Do you see that? It is  
20 like the third line down.  
21 A. Yes.  
22 Q. That is Kaplan, right?  
23 A. Yes.  
24 Q. "I have given him a little  
25 extra bonus when he worked hard

1 G. C. ROBINSON  
 2 during the festival," et cetera,  
 3 correct?  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 Q. Do you see that?  
 7 A. Yes, that is what it says.  
 8 Q. Okay.  
 9 So at this point in time,  
 10 September 2012, it seems like  
 11 according to this e-mail you are  
 12 making a decisions as to whether Mr.  
 13 Kaplan receives a bonus, or at a  
 14 minimum, that you are recommending  
 15 that to Mr. De Niro, is that fair?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. I don't know if I would  
 19 characterize it that way.  
 20 Q. How would you characterize  
 21 it?  
 22 A. These are all things that  
 23 Bob would have to approve if they --  
 24 if Michael was given more of a bonus  
 25 or something after the festival. It

1 G. C. ROBINSON  
 2 would be a discussion between Bob  
 3 and myself, or Mark Bosswick and  
 4 Bob. I did not have the approval to  
 5 actually make decisions on who got  
 6 bonuses. There would be -- at this  
 7 time, there would be a suggestion,  
 8 but it would be Bob's decision of  
 9 what he would like to do.  
 10 Q. So you would make  
 11 recommendations, correct?  
 12 MS. HARWIN: Objection to  
 13 the form.  
 14 A. In this case, yes, I did.  
 15 Q. Okay.  
 16 And as far as you recall,  
 17 did Mr. De Niro adopt your  
 18 recommendations?  
 19 MS. HARWIN: Objection to  
 20 the form.  
 21 A. Are you talking about this  
 22 specific paragraph and whether he  
 23 did or not?  
 24 Q. It is referring to the past  
 25 tense. So I am guessing that Mr.

1 G. C. ROBINSON  
 2 Kaplan was given this extra bonus  
 3 that you referred, no?  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 A. I believe he was, with  
 7 Bob's approval, of course.  
 8 Q. Following your  
 9 recommendation?  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 A. Yes, following a discussion  
 13 that Bob and I had.  
 14 Q. Okay.  
 15 So according to this --  
 16 withdrawn.  
 17 November 1, 2012, your  
 18 salary goes up to 150, is that  
 19 consistent with your recollection?  
 20 MS. HARWIN: Objection to  
 21 the form.  
 22 A. I can't recall the amount  
 23 that it went up to or what it was in  
 24 2012.  
 25 Q. Do you recall ever

1 G. C. ROBINSON  
 2 receiving \$150,000 per year from  
 3 Canal?  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 A. I can't recall the specific  
 7 salary of 150.  
 8 Q. Beyond 95,000 -- excuse me.  
 9 Above 95,000, what specific  
 10 salary do you recall earning from  
 11 Canal?  
 12 MS. HARWIN: Objection to  
 13 the form.  
 14 A. I can recall in 2019 being  
 15 given an annual salary of 300.  
 16 Q. You have no recollection of  
 17 any other salaries?  
 18 A. I am still going. I can  
 19 recall at some point it being 175,  
 20 but I can't recall the year. And I  
 21 believe at one point I can recall  
 22 200, but I can't -- the earlier  
 23 years I can't recall specifically  
 24 what my salaries were -- what my  
 25 base salaries were. I can't recall

1 G. C. ROBINSON

2 off the top of my head.

3 Q. Following the time that  
4 Canal increased your salary after  
5 95,000, what was your understanding  
6 as to why you were receiving more  
7 compensation?

8 MS. HARWIN: Objection to  
9 the form.

10 A. I don't recall specifically  
11 when it was 95, and when -- when it  
12 was changed to 95. So I wouldn't be  
13 able to discuss why it was changed  
14 if I don't have the date and the  
15 information of when it was.

16 Q. At any time after --  
17 whatever salary you were earning at  
18 the time that you commenced your  
19 employment with Canal, what was your  
20 understanding as to why it was ever  
21 increased?

22 MS. HARWIN: Objection to  
23 the form.

24 A. I think some of the reasons  
25 would have been my requests for it,

1 G. C. ROBINSON

2 the amount of hours that I continued  
3 to work that were -- where I had  
4 felt that I wasn't being compensated  
5 for the hours that I was working,  
6 and I would also add the promotion.

7 Q. And when you say,  
8 "promotion," what are you referring  
9 to?

10 MS. HARWIN: Objection to  
11 the form.

12 A. The change in title with  
13 director of production.

14 Q. So you received a raise  
15 when you were -- when your title  
16 changed to director of production,  
17 correct?

18 A. I can't specifically recall  
19 exactly when I was given a raise  
20 around the time that I had my title  
21 changed.

22 Q. When your title changed to  
23 director of production, it was, as  
24 you just characterized it, a  
25 promotion. What was your

1 G. C. ROBINSON

2 understanding as to why you were  
3 being promoted?

4 MS. HARWIN: Objection to  
5 the form.

6 A. Bob and I had discussions,  
7 as I said, that I would be  
8 transitioning from executive  
9 assistant to focusing on production  
10 and working with Berry Welsh at  
11 Tribeca. He would -- he handled  
12 creative or development, and I would  
13 be handling production.

14 Q. Did your responsibilities  
15 within Canal also increase before  
16 the time that Mr. De Niro approved  
17 your title change to director of  
18 production?

19 MS. HARWIN: Objection to  
20 the form.

21 A. During the early -- during  
22 the earlier years, there were jobs  
23 where Bob would ask me to -- to do  
24 something such as -- there was just  
25 different jobs that I would -- that

1 G. C. ROBINSON

2 Bob had directed me to do that were  
3 not the things that necessarily  
4 continued -- I think there were --  
5 there were additional jobs I just  
6 can't think of what they were during  
7 that time period at this moment.

8 Q. So your responsibilities,  
9 with respect to managing Canal  
10 personnel, increased at the time  
11 that you received the director of  
12 production title?

13 MS. HARWIN: Objection to  
14 the form.

15 A. They weren't supposed to.  
16 I was supposed to focus my job  
17 solely on production and replacing  
18 myself with somebody to be Bob's  
19 executive assistant, and then I  
20 would move on to solely work in  
21 production. But like many of the  
22 titles that I had, and many of the  
23 jobs that I had in the office, I  
24 would be redirected to work on  
25 something personal for Bob. I was



1 G. C. ROBINSON  
 2 --  
 3 Q. Hold on a second. I'm  
 4 sorry to interrupt. We are  
 5 getting --  
 6 MR. BENNETT: Can you  
 7 read the question back?  
 8 (Whereupon, the requested  
 9 portion was read back by the  
 10 reporter:  
 11 Q: So your  
 12 responsibilities, with  
 13 respect to managing Canal  
 14 personnel, increased at the  
 15 time that you received the  
 16 director of production  
 17 title?)  
 18 Q. It is a yes or no, Ms.  
 19 Robinson.  
 20 MS. HARWIN: Objection to  
 21 the form.  
 22 MR. DROGIN: For the  
 23 record, that wasn't a  
 24 question that you objected to  
 25 the form of, it was a

1 G. C. ROBINSON  
 2 statement.  
 3 MS. HARWIN: There is no  
 4 question pending then --  
 5 MR. BENNETT: There is a  
 6 question pending.  
 7 MR. DROGIN: I think the  
 8 statement --  
 9 MS. HARWIN: Mr. Bennett,  
 10 do you want to clarify the  
 11 question that is pending?  
 12 MR. DROGIN: I just think  
 13 the record should be clear  
 14 that Mr. Bennett's statement  
 15 was it is just a yes-or-no  
 16 question and you objected to  
 17 the form of that statement.  
 18 You should let him ask the  
 19 question before you object to  
 20 it.  
 21 MR. BENNETT: Can you  
 22 read the question back again,  
 23 please?  
 24 (Whereupon, the requested  
 25 portion was read back by the

1 G. C. ROBINSON  
 2 reporter:  
 3 Q: So your  
 4 responsibilities, with  
 5 respect to managing Canal  
 6 personnel, increased at the  
 7 time that you received the  
 8 director of production  
 9 title?)  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 A. I can't recall that they  
 13 were -- I can't recall that they  
 14 were.  
 15 Q. As of the date that your  
 16 title goes -- becomes director of  
 17 production, did you manage Canal's  
 18 personnel?  
 19 MS. HARWIN: Objection to  
 20 the form.  
 21 A. When I had received the  
 22 title of director of production I  
 23 was still functioning as Bob's  
 24 executive assistant.  
 25 Q. Is that a yes or no, Ms.

1 G. C. ROBINSON  
 2 Robinson?  
 3 A. I was still functioning as  
 4 Bob's executive assistant, and when  
 5 he directed me to do something, I  
 6 did it. I wasn't --  
 7 Q. Were you -- go on.  
 8 A. I was Bob's executive  
 9 assistant at the time.  
 10 Q. Were you managing Canal  
 11 personnel at all?  
 12 MS. HARWIN: Objection to  
 13 the form.  
 14 A. I think that there were  
 15 times that Bob directed me to. I  
 16 think there were times that Bob  
 17 directed me to, but it wasn't  
 18 something that was a regular part of  
 19 my job. I facilitated a lot of  
 20 messages from him to others, but it  
 21 wasn't, again, a regular part of my  
 22 job.  
 23 MR. BENNETT: I would  
 24 like to take a break. Let's  
 25 come back at 3:35, please.



1 G. C. ROBINSON  
 2 MS. HARWIN: Okay.  
 3 (Whereupon, a recess was  
 4 taken at this time.)  
 5 Q. Ms. Robinson, you talked to  
 6 me a little bit about what you were  
 7 doing for Canal during various  
 8 years. As of 2015, what was Dan  
 9 Harvey doing for Canal?  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 A. Dan Harvey, like I, was  
 13 functioning as an executive  
 14 assistant.  
 15 Q. In what way -- withdraw the  
 16 question.  
 17 What is your understanding  
 18 as to the term executive assistant,  
 19 what type of job duties fall within  
 20 that description?  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. I would say core material  
 24 duties of an executive assistant is  
 25 doing what Bob asks and directing an

1 G. C. ROBINSON  
 2 employee to do.  
 3 Q. Okay.  
 4 And going back to my  
 5 question earlier, what does Dan  
 6 Harvey do. I will reiterate that  
 7 question again.  
 8 What was Dan Harvey doing  
 9 for Canal, specifically, as of 2015?  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 A. Dan Harvey --  
 13 (Whereupon, a discussion  
 14 was held off the record.)  
 15 A. Dan Harvey, like me,  
 16 handled what Bob directed us to do,  
 17 whether it was picking him up  
 18 coffee, or newspapers, or at times  
 19 organizing a meeting for Bob,  
 20 accompanying Bob on set when I was  
 21 requested. He helped put together  
 22 the gym at [REDACTED]. He, like I, did  
 23 supported his wellbeing, his  
 24 physical wellbeing, and his -- and  
 25 his health. Dan worked a couple --

1 G. C. ROBINSON  
 2 at times an hour or two a couple of  
 3 times a week training Bob, but at  
 4 times he did not train Bob for weeks  
 5 at a time and at times a month.  
 6 When Bob was in California at [REDACTED]  
 7 Dan facilitated items that Bob  
 8 needed during that time. Dan, in  
 9 addition, at times, worked with  
 10 production on Bob's needs when it  
 11 came to gym or anything related to  
 12 his -- his needs. There were --  
 13 Q. From your perspective --  
 14 A. Can I finish?  
 15 Q. No. Because it is really  
 16 running far afield.  
 17 Is your perspective that  
 18 every person that Canal compensated  
 19 had no independent role, they simply  
 20 did what Mr. De Niro directed them  
 21 to do or was it something different?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. I think that is the core  
 25 material responsibility at Canal is

1 G. C. ROBINSON  
 2 to do what Bob directed of you  
 3 regardless what title or what jobs  
 4 you might do a little bit more of.  
 5 It really was what Bob asked you to  
 6 do. And a lot of times it went  
 7 outside any title that any Canal  
 8 employee would have. Everybody --  
 9 Q. Do you know specifically  
 10 what Mr. De Niro directed Mr. Dan  
 11 Harvey to do on a day-to-day basis?  
 12 MS. HARWIN: Objection to  
 13 the form.  
 14 A. I don't know the full  
 15 extent of what Dan Harvey's role is.  
 16 I can only, as discussed before,  
 17 give examples of things that I had  
 18 seen.  
 19 Q. And have you ever seen Dan  
 20 Harvey hand out work assignments to  
 21 Sabrina, Jillian, or Katherine, or  
 22 Lu Lu, or anyone else that were  
 23 employed as administrative  
 24 assistants?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 the form.  
 3 A. I had seen Dan Harvey  
 4 direct Michael Kaplan when it came  
 5 to gym equipment and things that had  
 6 to do with 110. I had been directed  
 7 by Dan Harvey, as did Amelia and  
 8 Olivia, to book flights for Dan  
 9 Harvey. There -- those are some of  
 10 the things that I can recall at this  
 11 moment.  
 12 Q. Did Dan Harvey ever work on  
 13 the transactional documents related  
 14 to any particular film production  
 15 that Mr. De Niro was involved in?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. Can you clarify  
 19 transactional documents?  
 20 Q. Well, in -- in connection  
 21 with your various roles within  
 22 Canal, over the course of the years,  
 23 you interacted with Peter Grant on  
 24 transactions involving Mr. De Niro's  
 25 acting services, correct?

1 G. C. ROBINSON  
 2 the form.  
 3 A. Yes, there were a few times  
 4 where I did, which goes to, as I  
 5 said, working with Bob -- what Bob's  
 6 needs are on productions. What he  
 7 needed.  
 8 Q. Right. So on those  
 9 occasions that you were working with  
 10 Peter Grant on the perk budgets for  
 11 a particular production, what were  
 12 you doing specifically?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. On the couple of films that  
 16 had perk budgets, I was researching  
 17 costs of hotel rooms for Bob, and  
 18 Bob's family, researching costs and  
 19 providing them for what Bob's needs  
 20 were on -- on set.  
 21 Q. Relative to the overall  
 22 budget of the perks, correct?  
 23 MS. HARWIN: Objection to  
 24 the form.  
 25 A. The perk budget was what

1 G. C. ROBINSON  
 2 MS. HARWIN: Objection to  
 3 the form.  
 4 A. I spoke to Peter Grant  
 5 about Bob's needs in production.  
 6 Q. Your work went a little bit  
 7 more beyond speaking with him,  
 8 correct?  
 9 MS. HARWIN: Objection to  
 10 the form.  
 11 A. Can you clarify? Can you  
 12 rephrase that?  
 13 Q. It is your words, Ms.  
 14 Robinson. Over the course of years  
 15 you have probably hundreds of  
 16 e-mails back and forth with Peter  
 17 Grant reflecting various aspects of  
 18 work relating to a varying number of  
 19 films or movies or production that  
 20 Mr. De Niro was involved in.  
 21 A. Yes.  
 22 Q. Do you recall specifically  
 23 working with Peter Grant about, for  
 24 example, perk budgets?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 Bob's needs were on --  
 3 Q. Right.  
 4 A. -- on a couple of films.  
 5 Q. Did Dan Harvey ever  
 6 exchange e-mails with Attorney Grant  
 7 relative to any issue with a perk  
 8 budget on any film?  
 9 MS. HARWIN: Objection to  
 10 the form.  
 11 A. Not that I can recall.  
 12 Q. Did Dan Harvey ever notify  
 13 employees about raises or bonuses?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. Not that I can recall.  
 17 Q. Did Dan Harvey ever inform  
 18 Burton, Michael Tasch, Mark  
 19 Bosswick, or anyone else about  
 20 raises or bonuses of Canal  
 21 personnel?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. Other than himself, I can't  
 25 recall.

1 G. C. ROBINSON  
 2 Q. Did Dan Harvey ever make  
 3 recommendations to Mr. De Niro about  
 4 an increase or a decrease of  
 5 compensation for Canal personnel at  
 6 any time?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 A. I can't recall or I don't  
 10 know the full extent of Dan Harvey's  
 11 position, or what he may or -- I am  
 12 not going to speculate to what he  
 13 may or may not have spoken to Bob  
 14 about.  
 15 Q. So you don't know?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. I don't know to which  
 19 question?  
 20 MR. BENNETT: Can you  
 21 read the question back?  
 22 (Whereupon, the requested  
 23 portion was read back by the  
 24 reporter:  
 25 Q: Did Dan Harvey ever

1 G. C. ROBINSON  
 2 make recommendations to Mr.  
 3 De Niro about an increase or  
 4 a decrease of compensation  
 5 for Canal personnel at any  
 6 time?)  
 7 A. I don't know and I can't  
 8 recall a time when I was present  
 9 that he did.  
 10 Q. Did Dan Harvey, as far as  
 11 you are aware of, have an e-mail  
 12 address for Canal -- withdrawn.  
 13 At the time that you were  
 14 employed by Canal Productions, one  
 15 of the e-mail addresses that you had  
 16 ended in @CanalProductions.com,  
 17 correct?  
 18 A. Yes, that was one of them.  
 19 Q. Okay.  
 20 Did Dan Harvey ever have an  
 21 e-mail address that ended in  
 22 @CanalProductions.com?  
 23 MS. HARWIN: Objection to  
 24 the form.  
 25 A. During the time that I was

1 G. C. ROBINSON  
 2 at Canal, I can't recall him having  
 3 one.  
 4 Q. To clarify -- thank you.  
 5 There is no question today that I am  
 6 going to ask you that occurs outside  
 7 of the time period that you were  
 8 employed.  
 9 As far as you can recall,  
 10 between 2008, when you commenced  
 11 employment with Canal, and the date  
 12 of your resignation, on April 6,  
 13 2019, how many times did Dan Harvey  
 14 step inside Canal's office?  
 15 MS. HARWIN: Can I  
 16 clarify, the office at 375  
 17 Greenwich Street?  
 18 MR. BENNETT: Yes. That  
 19 is correct.  
 20 A. I can't recall.  
 21 Q. Do you recall ever seeing  
 22 him in that office?  
 23 A. Yes.  
 24 Q. Okay.  
 25 More than once?

1 G. C. ROBINSON  
 2 A. Yes.  
 3 Q. As far as you are aware,  
 4 where would Mr. Harvey regularly  
 5 stay when he was in New York?  
 6 MS. HARWIN: Objection to  
 7 the form.  
 8 A. He would either stay at --  
 9 either stay at the Greenwich Hotel  
 10 or with his mother in Long Island,  
 11 from what I can recall.  
 12 Q. Okay.  
 13 Do you know how many films  
 14 Mr. Harvey has worked with Mr. De  
 15 Niro on?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. I don't.  
 19 Q. Do you know anything about  
 20 his educational or work experience  
 21 prior to beginning employment with  
 22 Canal?  
 23 MS. HARWIN: Objection to  
 24 the form.  
 25 A. No, I can't recall a

1 G. C. ROBINSON  
2 conversation where I would have --  
3 that I would have known anything  
4 about what he did prior to Canal.

5 Q. As far as you recall,  
6 within the amounts included with any  
7 particular perk budget that Mr. De  
8 Niro obtained at any point over the  
9 course of your employment with  
10 Canal, was there a portion of that  
11 perk budget that was intended to  
12 offset your salary that was paid by  
13 Canal?

14 MS. HARWIN: Objection to  
15 the form.

16 A. Not specific to my salary,  
17 no.

18 Q. Can you refer to the  
19 exhibit? I am just going to ask you  
20 to please turn to page nine of 20.

21 A. Which exhibit?

22 Q. It is the one P13908.

23 A. What page?

24 Q. Nine.

25 Before we talk about this,

1 G. C. ROBINSON  
2 my understanding is one of the  
3 claims that you have made in this  
4 action is that you feel as though  
5 you were not paid in an equivalent  
6 manner to Dan Harvey, is that  
7 correct?

8 MS. HARWIN: Objection to  
9 the form.

10 A. I had made a complaint  
11 about, and objected to, being paid  
12 less than Dan Harvey.

13 Q. Right. But the claim in  
14 this action is basically saying the  
15 same thing, correct?

16 MS. HARWIN: Objection to  
17 the form.

18 A. I have a claim, yes.

19 Q. What duties of yours and  
20 Dan Harvey overlapped?

21 MS. HARWIN: Objection to  
22 the form.

23 Q. If any?

24 A. As I said, both Dan and I  
25 functioned as executive assistant to

1 G. C. ROBINSON  
2 Bob. When directed to, we ran  
3 errands, picked up coffee, did what  
4 Bob directed us to do. We both  
5 supported his physical wellbeing and  
6 his health. We both had a part in  
7 helping with the [REDACTED] project. Dan  
8 Harvey helped put the gym together  
9 and what equipment would be needed  
10 there. We both -- we both did what  
11 Bob directed us to do. When Bob  
12 asked either Dan Harvey or I to  
13 accompany on set, we did. Dan  
14 Harvey helped arrange meetings for  
15 Bob at times when they were on set  
16 and away. He facilitated paperwork  
17 when it came to when Bob was on set.  
18 He traveled with Bob when Bob asked  
19 him to, which is what I did as well.  
20 There are many -- many examples, but  
21 that is what comes to mind at this  
22 moment.

23 Q. You testified not long ago  
24 that you weren't sure what Mr. De  
25 Niro asked Mr. Harvey to do,

1 G. C. ROBINSON  
2 correct?

3 MS. HARWIN: Objection to  
4 the form.

5 A. I wasn't sure of the full  
6 extent of what Bob had asked Dan  
7 Harvey to do. As I am not aware of  
8 the full extent of what Dan Harvey's  
9 general responsibilities were.

10 Q. Right, so in that respect,  
11 how is it that you have knowledge of  
12 overlapping duties?

13 MS. HARWIN: Objection to  
14 the form.

15 A. As I said, I can only  
16 attest to ones that I had seen, been  
17 involved in, or knew about.

18 Q. Are there any duties that  
19 you performed that Mr. Harvey did  
20 not perform?

21 MS. HARWIN: Objection to  
22 the form.

23 A. I think there were duties  
24 that were stereotypically female  
25 that I was asked to do, such as set

1 G. C. ROBINSON  
 2 up tables for the birthday party for  
 3 Bob, picking out gifts, going  
 4 shopping with him.  
 5 Q. How do you know Mr. Harvey  
 6 didn't do those things?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 I will note that it  
 10 appears that the witness did  
 11 not complete --  
 12 MR. DROGIN: It appears  
 13 that the witness wasn't  
 14 answering the question  
 15 actually.  
 16 A. I'm sorry to ask, can the  
 17 court reporter just read the last  
 18 portion of my answer?  
 19 (Whereupon, the requested  
 20 portion was read back by the  
 21 reporter:  
 22 A: I think there were  
 23 duties that were  
 24 stereotypically female that I  
 25 was asked to do, such as set

1 G. C. ROBINSON  
 2 up tables for the birthday  
 3 party for Bob, picking out  
 4 gifts, going shopping with  
 5 him.)  
 6 A. I have lost my train of  
 7 thought. Let's move to the --  
 8 whatever question you have next.  
 9 Q. So do you not have an  
 10 answer to that?  
 11 A. Can you repeat your  
 12 question?  
 13 MR. BENNETT: Can you  
 14 read it back?  
 15 (Whereupon, the requested  
 16 portion was read back by the  
 17 reporter:  
 18 Q: Are there any duties  
 19 that you performed that Mr.  
 20 Harvey did not perform?)  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. I don't know because I  
 24 don't know the full extent of Dan  
 25 Harvey's responsibility, or what Bob

1 G. C. ROBINSON  
 2 directed him to do, or asked him to  
 3 do.  
 4 Q. During the work that you  
 5 performed on perk budgets, do you  
 6 ever recall seeing Mr. Harvey's name  
 7 referenced?  
 8 MS. HARWIN: Objection to  
 9 the form.  
 10 A. Yes. He was on -- I can  
 11 recall him being on a perk budget  
 12 for expenses.  
 13 Q. He was listed as a personal  
 14 trainer, correct?  
 15 MS. HARWIN: Objection to  
 16 the form.  
 17 A. He was listed as what --  
 18 one of Bob's needs on sets. I don't  
 19 recall if it was specified -- if he  
 20 was specified with the title of  
 21 trainer. I recall putting in Dan  
 22 Harvey.  
 23 Q. Do you think you described  
 24 his job function as whatever Bob  
 25 needed or personal trainer?

1 G. C. ROBINSON  
 2 MS. HARWIN: Objection to  
 3 the form.  
 4 A. I wouldn't -- I don't ever  
 5 recall describing what Dan Harvey  
 6 was on a perk fund budget.  
 7 Q. Okay.  
 8 Do you know if Mr. Harvey  
 9 was ever credited in any films, and  
 10 if so, what title was within the  
 11 credit?  
 12 MS. HARWIN: Objection to  
 13 the form.  
 14 A. I can't recall seeing him  
 15 on the credits on any of Bob's  
 16 films.  
 17 Q. And at one point you were  
 18 advised by, I think, it was Berry  
 19 Welsh, that you were not able to be  
 20 credited on a particular film. Is  
 21 that right?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. No, that is not correct.  
 25 Q. Did anyone from Tribeca

1 G. C. ROBINSON  
 2 inform you that they were not able  
 3 to reference you to give a credit as  
 4 quote unquote "director" in whole or  
 5 in part on any film?  
 6 MS. HARWIN: Objection to  
 7 the form.  
 8 A. Berry Welsh had e-mailed me  
 9 about being unable to have me  
 10 credited as director of production.  
 11 And therefore, offered to give me an  
 12 assistant credit, in which I  
 13 declined to do because it wasn't --  
 14 it was lower than director of  
 15 production, and I had spoken to Bob  
 16 about it.  
 17 Q. And at the time, Mr. Welsh  
 18 advised you in the e-mail that HBO  
 19 prohibited him from doing so,  
 20 correct?  
 21 MS. HARWIN: Objection to  
 22 the form.  
 23 A. I can't recall what was  
 24 specifically in that e-mail.  
 25 Q. Okay.

1 G. C. ROBINSON  
 2 paragraph, you say, "I have long  
 3 moved on to film production,  
 4 financial matters, oversight, and a  
 5 host of other things."  
 6 Do you see that?  
 7 A. Yes.  
 8 Q. Was that true?  
 9 MS. HARWIN: Objection to  
 10 the form.  
 11 MR. DROGIN: You are  
 12 objecting to the form of the  
 13 question that asks your  
 14 client to confirm whether or  
 15 not something she wrote is  
 16 true?  
 17 MS. HARWIN: I objected  
 18 to the form of the question.  
 19 MR. DROGIN: Okay.  
 20 A. That is what I wrote in the  
 21 e-mail.  
 22 Q. That wasn't the question.  
 23 Is it true or not?  
 24 MS. HARWIN: Objection to  
 25 the form.

1 G. C. ROBINSON  
 2 Would it surprise you if  
 3 that is what the reason was?  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 A. Because I don't know, I am  
 7 not going to speculate on -- on it.  
 8 Q. Okay.  
 9 Can you just please look at  
 10 page nine of the exhibit called  
 11 P13908? I would like you to please  
 12 focus your attention on the e-mail  
 13 at the bottom, which is February 26,  
 14 2019, at 9:46 p.m. If you could  
 15 read that to yourself, and I will  
 16 ask you a question.  
 17 A. (Witness complies).  
 18 Okay.  
 19 Q. Are you making a  
 20 distinction here between yourself  
 21 and Sabrina and Jillian?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. Yes.  
 25 Q. And in the second

1 G. C. ROBINSON  
 2 A. Yes, that is what I wrote  
 3 in the e-mail.  
 4 Q. Do you understand what I am  
 5 asking? I am asking you to confirm  
 6 whether it was truthful or not. If  
 7 it is not, it was not. It is not a  
 8 difficult question.  
 9 A. As I said, yes, that is  
 10 what I wrote in the e-mail.  
 11 Q. So it is true?  
 12 MS. HARWIN: Objection to  
 13 the form.  
 14 A. As I said, yes.  
 15 Q. Okay. Thank you.  
 16 MR. DROGIN: I think the  
 17 question is asking -- I think  
 18 the question was, was it true  
 19 that, and then just go  
 20 through each of these things,  
 21 was it true that A, was it  
 22 true that B, was it true that  
 23 C. That is the only way you  
 24 are going to get the answer  
 25 is asking directly was it



G. C. ROBINSON

true.

Q. If you could please focus your attention on page seven. It is an e-mail from yourself to Bob Shepherd, which is Bob. December 11th, 2017 at 9:55.

Do you see that?

A. Yes.

Q. At the time that you sent this, in December of 2017, was it accurate that your job for Canal encompassed production, including budget, deals, logistics, and financial perks?

A. There were times that I handled these items for Bob, but one of the biggest issues that I faced is that Bob and I would discuss this job or being director of production or VP of finance and what the job would entail. But it was continuous where Bob would redirect me, and my job to do what he directed. And it was -- the redirection was always

G. C. ROBINSON

doing things that were personal or not what the title or the job that we had discussed that I had hoped to do. For example, when I was director of production, he --

Q. At the time that you sent this, were you doing budgets deals, logistics, and financial perks?

A. Can I --

MS. HARWIN: Objection to the form.

Q. That is the question. I am not asking for a lengthy narrative response over the course of six months or a year.

When you sent this e-mail to Mr. De Niro, was that correct, were you doing budgets deals, logistics, and financial perks?

A. There were items that he had directed me to do that encompassed those things. But it wasn't something that I did on a regular basis. He directed me to do

G. C. ROBINSON

them, and then he would direct me to do something else, as I was trying to discuss in my last response.

Q. So at the time that you sent this e-mail, were you also managing the office, including oversight, finance, salary/bonuses, HR, and operational issues?

MS. HARWIN: Can you clarify where you are in the exhibit?

MR. BENNETT: At the bottom of page one, right below the bolded language of the e-mail. It is page seven of the exhibit.

MS. HARWIN: Oh. Page seven, not page one. Okay.

Q. Do you understand the question, Ms. Robinson?

A. Yes. There were items that Bob directed me to do that included those things. But as I said, again, they were things that he directed me

G. C. ROBINSON

to do. Whether it was helping to Toukie Smith with her financial items after her [REDACTED], or, you know, handling -- talking to Bob and having him approve to put petty cash Excel sheet in the office to sort of track things. These were not things that were consistently done or regularly done, but they are things that I did. As I was trying to explain prior to, there were a lot conversations with Bob where I would have to try to realign my job with what he and I had discussed on the job that I should have been doing, and that I wanted to do where he was redirected me to do things that were in a personal nature and had nothing do with these things. There were many conversations over my employment that was -- was exactly -- was exactly that.

Q. Can you please go down to page 13?



1 G. C. ROBINSON  
 2 A. Okay.  
 3 Q. Sorry, just give me one  
 4 moment, please. I am going to go  
 5 backwards a little bit. If you  
 6 don't mind, please go to page four.  
 7 A. (Witness complies).  
 8 Okay.  
 9 Q. If you look at the second  
 10 to last paragraph, this is an e-mail  
 11 July 18, 2017, at 8:59 p.m.,  
 12 correct?  
 13 A. Yes.  
 14 Q. You see the second to last  
 15 paragraph, it starts with, "You  
 16 know?"  
 17 A. Yes, I see that.  
 18 Q. Okay.  
 19 As of July 2017, were you  
 20 considering or looking for  
 21 alternative employment outside of  
 22 Canal?  
 23 MS. HARWIN: Objection to  
 24 the form.  
 25 A. Prior to -- sorry. Can you

1 G. C. ROBINSON  
 2 repeat your question?  
 3 Q. In July of 2017, were you  
 4 looking to leave Canal, were you  
 5 looking for alternative employment  
 6 at that time?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 A. No. This was a  
 10 conversation with Bob where I  
 11 discussed wanting to eventually  
 12 transition out of Canal Productions.  
 13 Q. And as of July 2017, you  
 14 were telling him that you loved your  
 15 job and you adored him, correct?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. I understand what that  
 19 reads, but I think that in working  
 20 for Bob one of the things that when  
 21 you -- when he agrees to something,  
 22 or you approach something like this,  
 23 you are always sensitive to how he  
 24 would react. As I have learned in  
 25 the past, how retaliatory he could

1 G. C. ROBINSON  
 2 be, if you don't approach it in a  
 3 way where he has adoration in -- you  
 4 know, being grateful or not  
 5 disrespecting him. So there are  
 6 lines of that in -- in this -- in  
 7 this e-mail.  
 8 Q. Okay. Great.  
 9 Please flip to page 13.  
 10 Tell me if this is incorrect, that  
 11 you provided a draft recommendation  
 12 letter to Mr. De Niro, to consider  
 13 on June 4, 2019?  
 14 A. I provided a recommendation  
 15 -- a draft recommendation letter at  
 16 Tom Harvey's request for Bob.  
 17 Q. Did Tom Harvey tell you to  
 18 lie?  
 19 MS. HARWIN: Objection to  
 20 the form.  
 21 A. No.  
 22 Q. Okay.  
 23 Can you read -- could you  
 24 go to page 14 and page 15, please?  
 25 A. Okay.

1 G. C. ROBINSON  
 2 Q. I am going to represent to  
 3 you that what appears on pages 14  
 4 and 15 were the attachments to the  
 5 e-mails that we just looked at. At  
 6 the time that you wrote this letter  
 7 and presented it to Mr. De Niro, did  
 8 it contain truthful information?  
 9 MS. HARWIN: Objection to  
 10 the form.  
 11 A. Yes.  
 12 Q. If you go down to page 18  
 13 and 19, please.  
 14 A. 18 and 19?  
 15 Q. Yes.  
 16 A. (Witness complies).  
 17 Yes.  
 18 Q. Is this a draft of the  
 19 statement that we just looked at, or  
 20 is it something different?  
 21 A. I don't know.  
 22 Q. Did you draft this  
 23 statement?  
 24 A. I wrote this statement,  
 25 yes.

1 G. C. ROBINSON  
 2 Q. Is it truthful?  
 3 A. Yes.  
 4 MS. HARWIN: Objection to  
 5 the form.  
 6 Q. When it comes to the  
 7 personal work that you have  
 8 explained to us at various points  
 9 throughout today that you performed  
 10 for [REDACTED], for Mr. De Niro, for  
 11 Tiffany, is it your testimony here  
 12 today that you performed more of  
 13 that personal work on a yearly basis  
 14 than managing Canal's office?  
 15 MS. HARWIN: Objection to  
 16 the form.  
 17 A. I would say from 2015 on I  
 18 handled more personal projects and  
 19 items for Bob than I did managing  
 20 the office.  
 21 Q. Alright.  
 22 MR. BENNETT: It is 4:12.  
 23 I would like to take a break  
 24 until 4:25. 4:25. Thank  
 25 you.

1 G. C. ROBINSON  
 2 films Dan worked on.  
 3 Q. Under any perk budget that  
 4 Mr. De Niro received during a  
 5 particular film, there were amounts  
 6 allocated for both personal  
 7 assistant and personal trainer,  
 8 correct?  
 9 MS. HARWIN: Objection to  
 10 the form.  
 11 A. I don't think that is  
 12 correct.  
 13 Q. Can you recall a specific  
 14 film where that was not correct?  
 15 MS. HARWIN: Objection to  
 16 the form.  
 17 A. I believe it would be a  
 18 production assistant. And I don't  
 19 know what Dan was filed as. I don't  
 20 recall ever titling him in any perk  
 21 fund budget.  
 22 Q. Did you ever serve as a  
 23 production assistant on set for Mr.  
 24 De Niro?  
 25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 (Whereupon, a recess was  
 3 taken at this time.)  
 4 Q. Ms. Robinson, Dan Harvey  
 5 was hired by Canal in 1991, is that  
 6 correct?  
 7 MS. HARWIN: Objection to  
 8 the form.  
 9 A. I do not know when Dan  
 10 Harvey was hired by Canal  
 11 Productions.  
 12 Q. Mr. Harvey was credited in  
 13 film productions as Mr. De Niro's  
 14 trainer, yes or no?  
 15 MS. HARWIN: Objection to  
 16 the form.  
 17 A. I am not aware of him being  
 18 credited as Mr. De Niro's trainer on  
 19 any films.  
 20 Q. Mr. De Niro and Mr. Harvey  
 21 worked together on more than one  
 22 hundred films, yes or no?  
 23 MS. HARWIN: Objection to  
 24 the form.  
 25 A. I am not aware of how many

1 G. C. ROBINSON  
 2 the form.  
 3 A. Not formally, no.  
 4 Q. You testified earlier, and  
 5 a few times over the course of  
 6 today, that you and everyone else  
 7 who work for Canal were essentially  
 8 interchangeable in that employees  
 9 just carried out Mr. De Niro's wish,  
 10 is that correct?  
 11 MS. HARWIN: Objection to  
 12 the form.  
 13 A. I don't think I would  
 14 characterize it that way.  
 15 Q. Okay.  
 16 Relative to -- let's just  
 17 focus on the end part of your  
 18 employment with Canal. Focusing on  
 19 Sabrina, Jillian, and Mr. Kaplan,  
 20 why was it that your salary was so  
 21 significantly above all three of  
 22 them?  
 23 MS. HARWIN: Objection to  
 24 the form.  
 25 A. I think that there were

1 G. C. ROBINSON  
 2 several reasons, including the --  
 3 the job that Bob and I had discussed  
 4 that -- let me start over. What I  
 5 am trying to say is that in part  
 6 because of the job that Bob and I  
 7 had discussed and agreed on that I  
 8 was -- was not able to completely do  
 9 because Bob was redirecting me to  
 10 other -- other personal items, such  
 11 as, the [REDACTED] housing and redirecting  
 12 me to that. In addition I had also  
 13 discussed with Bob in 2008 and 2009,  
 14 parity and having parity when it  
 15 came to Dan Harvey. Those are some  
 16 of the reasons that come to mind  
 17 right now.

18 MR. BENNETT: Sorry. I  
 19 had technical issues.

20 MR. DROGIN: I suggest  
 21 you move to strike the answer  
 22 as nonresponsive and ask the  
 23 question again.

24 MR. BENNETT: I will move  
 25 to strike the answer if it is

1 G. C. ROBINSON  
 2 not responsive to the  
 3 question that was posed.  
 4 Q. Ms. Robinson, at the time  
 5 that you resigned, on April 6, 2019,  
 6 you were earning \$300,000 a year  
 7 from Canal, correct?

8 MS. HARWIN: Objection to  
 9 the form.

10 A. I had an annual salary of  
 11 300,000.

12 Q. And Michael Kaplan, as far  
 13 as you can recall, was making 80,000  
 14 per year at that time, correct?

15 MS. HARWIN: Objection to  
 16 the form.

17 A. I can't recall the exact  
 18 amount of the salary or compensation  
 19 he was given at that time.

20 Q. I am going to represent to  
 21 you that your salary was more than  
 22 three times Mr. Kaplan. And Mr.  
 23 Kaplan was above Jillian and  
 24 Sabrina's.

25 The question is this, you

1 G. C. ROBINSON  
 2 were earning that compensation  
 3 relative to the remaining personnel  
 4 within Canal, Jillian, Sabrina, and  
 5 Kaplan, because you were managing  
 6 all of them, correct?

7 A. No.

8 MS. HARWIN: Objection to  
 9 the form.

10 Q. You were making  
 11 recommendations to Mr. De Niro about  
 12 salary increases, office closures,  
 13 holiday schedules, and related  
 14 issues, correct?

15 MS. HARWIN: Objection to  
 16 the form.

17 A. I don't think I would  
 18 characterize it that way, and I  
 19 think some of the items that you  
 20 said are incorrect.

21 Q. Okay.

22 And you decided to  
 23 implement particular policies within  
 24 Canal, correct?

25 MS. HARWIN: Objection to

1 G. C. ROBINSON  
 2 the form.

3 A. At times when I was  
 4 directed to, I implemented what I --  
 5 policies that I was directed to  
 6 implement.

7 Q. You recommended to Mr. De  
 8 Niro that Canal adopt a policy,  
 9 whereby Canal personnel would be  
 10 reimbursed on a monthly basis for  
 11 gym memberships, correct?

12 A. I wouldn't necessarily  
 13 characterize it that way.

14 Q. Okay.

15 Did you identify or  
 16 recommend to Mr. De Niro that Canal  
 17 consider adopting some of the  
 18 services that Vantage Point Partners  
 19 were offering?

20 MS. HARWIN: Objection to  
 21 the form.

22 A. I had discussed Vantage  
 23 Point benefits with Bob, and he had  
 24 directed me to look into it, and we  
 25 discussed it.

1 G. C. ROBINSON  
 2 Q. And you made certain  
 3 recommendations to Mr. De Niro,  
 4 correct?  
 5 MS. HARWIN: Objection to  
 6 the form.  
 7 A. Can you clarify what  
 8 recommendations or give me examples?  
 9 Q. I will withdraw the  
 10 question.  
 11 Jillian and Sabrina would  
 12 send you completed time sheets,  
 13 correct?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 A. Yes, I was asked to collect  
 17 their time sheets, and send the  
 18 overtime to Burton.  
 19 Q. And you would correct them  
 20 where you noticed mistakes, correct?  
 21 A. If I noticed a mistake, I  
 22 would ask them to correct them so  
 23 that they were correct.  
 24 Q. And you and Tasch were the  
 25 only people who knew everyone's

1 G. C. ROBINSON  
 2 salary within Canal, correct?  
 3 MS. HARWIN: Objection to  
 4 the form.  
 5 A. No, that would not be  
 6 correct.  
 7 Q. Who else was privy to Canal  
 8 personnel salaries?  
 9 MS. HARWIN: Objection to  
 10 the form.  
 11 A. They would include Michael  
 12 Kaplan, Robin Chambers, Mark  
 13 Bosswick.  
 14 Q. Canal personnel I am asking  
 15 about, not external people.  
 16 A. Michael Tasch is not -- he  
 17 is employed by -- sorry. Michael  
 18 Kaplan, Robin Chambers. That is  
 19 what comes to mind right now.  
 20 Q. And you worked regularly  
 21 with Peter Grant, correct?  
 22 MS. HARWIN: Objection to  
 23 the form.  
 24 A. It is -- it varied over the  
 25 years, depending on Bob's film work

1 G. C. ROBINSON  
 2 and projects.  
 3 Q. Was there ever a time, a  
 4 year, where you did not work with  
 5 Peter Grant?  
 6 MS. HARWIN: Objection to  
 7 the form.  
 8 A. I believe in some way I  
 9 either worked or communicated with  
 10 him each year.  
 11 Q. Are you done?  
 12 A. Again, it varied depending  
 13 on what Bob's production was.  
 14 Q. And you also worked on an  
 15 annual basis with Burton, which  
 16 served as the external financial arm  
 17 of Canal, correct?  
 18 MS. HARWIN: Objection to  
 19 the form.  
 20 A. Can you repeat that  
 21 question? Sorry.  
 22 MR. BENNETT: Can you  
 23 read it back?  
 24 (Whereupon, the requested  
 25 portion was read back by the

1 G. C. ROBINSON  
 2 reporter:  
 3 Q: And you also worked  
 4 on an annual basis with  
 5 Burton, which served as the  
 6 external financial arm of  
 7 Canal, correct?)  
 8 A. I don't know if I would  
 9 characterize it as an external arm  
 10 for financial for Canal, but I did  
 11 communicate with people at Burton on  
 12 a yearly basis.  
 13 Q. You communicated with Tasch  
 14 and Bosswick on a regular basis,  
 15 didn't you?  
 16 MS. HARWIN: Objection to  
 17 the form.  
 18 A. I communicated more often  
 19 with Michael Tasch than Mark  
 20 Bosswick.  
 21 Q. And when it came to films  
 22 where Mr. De Niro would be required  
 23 to travel outside of New York, you  
 24 would help to facilitate Bob's  
 25 typical crew members so they would

1 G. C. ROBINSON  
 2 be on the film production, correct?  
 3 MS. HARWIN: Objection to  
 4 the form.  
 5 A. I would liaise with the  
 6 production about Bob's crew, and  
 7 they would be hired by production.  
 8 Q. And you would communicate  
 9 with the crew directly regarding  
 10 various issues that would come up on  
 11 one or more of the film productions,  
 12 correct?  
 13 MS. HARWIN: Objection to  
 14 the form.  
 15 A. At times, yes.  
 16 Q. Ernest, Voud (ph), other  
 17 folks that were included within the  
 18 crew, correct?  
 19 MS. HARWIN: Objection to  
 20 the form.  
 21 A. I communicated with them at  
 22 Bob's direction.  
 23 Q. So yes, you communicated  
 24 with them?  
 25 A. Yes, I communicated with

1 G. C. ROBINSON  
 2 them at Bob's direction.  
 3 Q. And would you travel to the  
 4 various film locations before  
 5 production -- before filming was  
 6 scheduled to commence, to scout it  
 7 out for Mr. De Niro?  
 8 MS. HARWIN: Objection to  
 9 the form.  
 10 A. At times I would travel to  
 11 locations outside of New York to  
 12 scout hotels and Bob's needs on  
 13 productions.  
 14 Q. And you would interview  
 15 prospective personal assistants,  
 16 correct?  
 17 MS. HARWIN: Objection to  
 18 the form.  
 19 A. At times I would interview  
 20 or more meet possible production  
 21 assistants for Bob.  
 22 Q. Thank you.  
 23 Can we just go back to some  
 24 --  
 25 MR. DROGIN: Do you mind

1 G. C. ROBINSON  
 2 if I ask some questions?  
 3 MS. HARWIN: We can't  
 4 have two different counsel  
 5 switching on and off asking  
 6 questions.  
 7 MR. DROGIN: Why not?  
 8 MS. HARWIN: It is -- it  
 9 is -- that is not how  
 10 depositions go. We don't  
 11 switch on and off when  
 12 counsel likes. Mr. Bennett  
 13 is in the middle of asking  
 14 questions.  
 15 MR. DROGIN: There is no  
 16 rule against it. We didn't  
 17 stipulate that only one  
 18 attorney would ask questions.  
 19 I just want to go back to  
 20 something.  
 21 EXAMINATION  
 22 BY MR. DROGIN:  
 23 Q. Are you aware of any time  
 24 that Dan Harvey was on the perk  
 25 budget as Bob's personal trainer?

1 G. C. ROBINSON  
 2 MS. HARWIN: Objection to  
 3 the form.  
 4 A. I don't recall a time where  
 5 he was listed as Bob's personal  
 6 trainer on --  
 7 Q. So -- so let's assume that  
 8 you don't recall. But if -- on a  
 9 production, if someone is listed as  
 10 a personal trainer, isn't the  
 11 company reimbursed for that portion  
 12 of the compensation paid to the  
 13 personal trainer?  
 14 MS. HARWIN: Objection to  
 15 the form.  
 16 Q. Can you answer that? Do  
 17 you understand the question?  
 18 A. Can you repeat if, please?  
 19 Q. Sure. I will give you an  
 20 example.  
 21 Let's say hypothetically  
 22 that Dan Harvey was listed in the  
 23 perk budget as Bob's personal  
 24 trainer for a movie, and there was  
 25 \$50,000 allocated to that.

1 G. C. ROBINSON  
 2 Wouldn't that mean that Bob  
 3 would be compensated \$50,000 under  
 4 the perk budget for the personal  
 5 trainer?  
 6 MS. HARWIN: Objection to  
 7 the form.  
 8 A. I can't really answer that.  
 9 Q. Okay. Okay. Good.  
 10 Now you were the vice  
 11 president of production and finance,  
 12 correct?  
 13 A. That was the title that I  
 14 was given at the end of 2017.  
 15 Q. You asked for that title,  
 16 didn't you, you came up with that  
 17 title?  
 18 MS. HARWIN: Objection to  
 19 the form.  
 20 Q. Did you come up with that  
 21 title?  
 22 A. Bob and I discussed several  
 23 different titles leading up to the  
 24 decision that that would be my  
 25 title.

1 G. C. ROBINSON  
 2 there a president of production and  
 3 finance?  
 4 A. Could I finish my --  
 5 Q. No. No.  
 6 Was there -- I am asking  
 7 the questions. I don't need  
 8 rambling answers. I don't need  
 9 rambling answers. I want to get  
 10 done with this in less than three  
 11 days.  
 12 Was there a president of  
 13 production and finance, yes or no?  
 14 A. There was no one with the  
 15 title of president of production and  
 16 finance.  
 17 Q. Other than Mr. De Niro, in  
 18 the organizational chart, was there  
 19 anyone between you and Mr. De Niro?  
 20 MS. HARWIN: Objection to  
 21 the form.  
 22 MR. DROGIN: You don't  
 23 have to keep objecting. The  
 24 world knows every time I ask  
 25 a question, you have an

1 G. C. ROBINSON  
 2 Q. It was part of the  
 3 discussion that you had with him  
 4 that was your new title, correct?  
 5 A. Yes.  
 6 Q. Were there any changes to  
 7 your job duties and responsibilities  
 8 as a consequence of that title  
 9 change, any?  
 10 MS. HARWIN: Objection to  
 11 the form.  
 12 MR. DROGIN: You can  
 13 object. You have an  
 14 objection to every word that  
 15 comes out my mouth you can  
 16 object to.  
 17 Q. Did your job change at all  
 18 other than title?  
 19 MS. HARWIN: Objection to  
 20 the form.  
 21 MR. DROGIN: We just went  
 22 through this.  
 23 A. My job in the end did not  
 24 really change.  
 25 Q. Thank you. Who was -- was

1 G. C. ROBINSON  
 2 objection to the form of it.  
 3 You are impeding my ability  
 4 to ask questions. You have a  
 5 standing objection. There is  
 6 no reason that you should be  
 7 interrupting my questioning  
 8 of this witness, and I am  
 9 going to ask you to stop.  
 10 Q. Can you please answer the  
 11 question? Was there anyone in  
 12 between you and Mr. De Niro?  
 13 A. Yes.  
 14 Q. Who?  
 15 A. There were people that were  
 16 senior to me including --  
 17 Q. Who?  
 18 MS. HARWIN: Counsel, she  
 19 is entitled to finish her  
 20 answer. The yelling at the  
 21 witness is not appropriate.  
 22 MR. DROGIN: Okay.  
 23 MS. HARWIN: She is  
 24 entitled to finish her  
 25 answers.



G. C. ROBINSON

MR. DROGIN: She is entitled to finish her answer to the question, not to the narrative that she has been programed to resort to. We all understand it. You have made a wonderful record here of showing how you can take, what should be a short deposition, and turn it into a long deposition. But now we need to get this consolidated so we can show the court how we had to rush through to the end after what has been going on all day.

Q. Who was above you below Mr. De Niro?

A. They included Robin Chambers, Michael Kaplan, on certain subjects or jobs at Canal Productions, and it also included people who made decisions on management for Canal Productions

G. C. ROBINSON

including Tom Harvey, Michael Tasch, Mark Bosswick. There were several people that were senior to me that made management decisions for Canal.

Q. And how many of the people were Canal employees that were senior to you?

A. I would say one, but Bob relied on these other people outside of Canal for management in Canal.

Q. I am not asking about non-Canal employees, because non-Canal employees are not suing him here, or suing Canal here.

Who -- what Canal employee or employees were above you and below Mr. De Niro, if any?

A. I think at times Robin Chambers and Michael Kaplan, like I said. There were --

Q. Okay.

So -- and what was Robin Chambers' compensation, do you know?

A. I am not aware of what her

G. C. ROBINSON

compensation was.

Q. So Robin Chambers was above you in the organizational chart here?

A. She was senior to me. It wasn't --

Q. Senior, meaning, the years she had worked, or senior in terms of duties and responsibilities, what does senior mean?

MS. HARWIN: Objection to the form.

A. Senior means that people that you would go to where Bob would direct you to -- to help or advise you on certain issues, which is why I also said Tom Harvey and Michael Tasch, which Bob would direct me to those people when it came to management or decisions on Canal when he would not handle them.

Q. Weren't you a direct report to Robert De Niro?

A. Yes.

G. C. ROBINSON

Q. You reported to him and he directed you, isn't that right?

A. He directed me in my job duty.

Q. He told you what to do, isn't that right?

A. Yes.

Q. He could change your title if he wanted, correct?

A. Yes.

Q. He could change your compensation if he wanted, correct?

A. Yes.

Q. He could have fired you if he wanted, correct?

A. Yes.

Q. He could have changed your duties and responsibilities if he wanted to, right?

A. Technically, I guess, yes.

Q. And in that regard, he could have changed the duties and responsibilities for other people who worked for Canal, couldn't he?



1 G. C. ROBINSON  
 2 A. Yes.  
 3 Q. He was the boss, wasn't he?  
 4 A. Yes.  
 5 Q. Alright. Now we are  
 6 getting somewhere.  
 7 Now when you became the  
 8 vice president of production and  
 9 finance, did you feel that some  
 10 employees were misusing money in  
 11 Canal -- in the Canal organization?  
 12 A. No, not that I recall.  
 13 Q. Okay. Great.  
 14 Would you agree that during  
 15 your employment you kept copious and  
 16 voluminous records?  
 17 A. Yes, I would agree to that  
 18 statement.  
 19 Q. Okay.  
 20 Do you know the phrase  
 21 "mind the store," have you ever  
 22 heard that phrase?  
 23 A. I can't think if I ever  
 24 heard that phrase before.  
 25 Q. Do you know what it means?

1 G. C. ROBINSON  
 2 A. If I haven't heard that  
 3 phrase before, no.  
 4 Q. Did you view your position  
 5 as one of trust, that Mr. De Niro  
 6 had to have trust in you?  
 7 A. I think like all employees,  
 8 he had to have trust.  
 9 Q. And did you trust him?  
 10 A. On certain things, yes. On  
 11 others, no. He was still my  
 12 employer.  
 13 Q. So you received a letter on  
 14 July 11, 2011, from Tom Harvey,  
 15 right? Sorry. July 11, 2019,  
 16 right?  
 17 A. Yes.  
 18 Q. And that was after you  
 19 resigned, correct?  
 20 A. Yes.  
 21 Q. And you had been trying to  
 22 reach Bob to sit down and talk to  
 23 him about what had happened, is that  
 24 fair?  
 25 A. Yes, I reached out to him

1 G. C. ROBINSON  
 2 on several occasions.  
 3 Q. And he ignored you, right?  
 4 A. He did not respond.  
 5 Q. So he ignored you, right?  
 6 A. Again, I go with my answer,  
 7 he did not respond.  
 8 Q. So when someone doesn't  
 9 respond, that is different than  
 10 ignoring in your world, is that what  
 11 you are telling me? Those two  
 12 phrases have different meanings;  
 13 ignore and failed to respond have  
 14 different meanings to you?  
 15 A. I am not going to speculate  
 16 on why he didn't respond. I am just  
 17 going to say that he didn't respond.  
 18 Q. Okay. He didn't respond.  
 19 Now in Tom Harvey's letter  
 20 to you, he wrote, "Please note that  
 21 Bob does not wish to communicate  
 22 with you."  
 23 Do you recall reading those  
 24 words?  
 25 A. Off the top of my head, I

1 G. C. ROBINSON  
 2 can't recall what the specific lines  
 3 were.  
 4 Q. Okay. Fair enough. Let's  
 5 see -- go to that letter. I will  
 6 help you out here.  
 7 Can you see that, Tom's  
 8 letter?  
 9 A. That is good.  
 10 Q. See it says, "Please note  
 11 that Bob does not wish to  
 12 communicate with you." Do you see  
 13 that?  
 14 A. Yes.  
 15 MS. HARWIN: Are you  
 16 going to mark this exhibit  
 17 that is being shown and  
 18 identify it for the record?  
 19 MR. DROGIN: Yeah. We  
 20 will mark it. We will mark  
 21 it later.  
 22 Is there a dispute that  
 23 -- this is the letter that  
 24 you filed, Ms. Harwin. Is  
 25 there a dispute about this

1 G. C. ROBINSON  
 2 letter?  
 3 MS. HARWIN: We just need  
 4 it for the record, the  
 5 exhibit number.  
 6 MR. DROGIN: It is the  
 7 Harvey letter, from July 11,  
 8 2019. Will you stipulate to  
 9 that?  
 10 MS. HARWIN: This is  
 11 Defendant's Exhibit D, is  
 12 that correct, sir?  
 13 MR. DROGIN: Sure.  
 14 Whatever -- yeah. Is it  
 15 correct is it D, E?  
 16 MR. BENNETT: I think D  
 17 is right.  
 18 MS. HARWIN: Mr. Drogin,  
 19 please remember to send it to  
 20 the court reporter so that  
 21 she has a copy that can be  
 22 appended to the deposition.  
 23 MR. DROGIN: Very good.  
 24 Thank you. We will do that.  
 25 (Whereupon, ROBINSON

1 G. C. ROBINSON  
 2 Exhibit D, a Tom Harvey  
 3 letter, from July 11, 2019,  
 4 was marked for  
 5 identification, as of this  
 6 date.)  
 7 Q. Now at this point in time  
 8 when you got this letter, were you  
 9 mad at Bob?  
 10 A. I was shocked.  
 11 Q. Were you -- I understand  
 12 that.  
 13 Were you mad?  
 14 A. I don't know if I would  
 15 characterize it as mad.  
 16 Q. Okay.  
 17 As we go on in this letter,  
 18 there is a couple of things here and  
 19 I will go through a bunch of them.  
 20 Can you see -- still see the letter?  
 21 A. Yes.  
 22 (Whereupon, a discussion  
 23 was held off the record.)  
 24 Q. Now you had not spoken with  
 25 Bob since you resigned, is that

1 G. C. ROBINSON  
 2 correct?  
 3 A. I believe, yes, that is  
 4 correct.  
 5 Q. And at the time that you  
 6 received this letter, you had  
 7 already conferred with Mr. Pagano,  
 8 is that right?  
 9 MS. HARWIN: Objection.  
 10 It is privileged.  
 11 MR. DROGIN: The fact  
 12 that she consulted with an  
 13 attorney when she testified  
 14 that she conferred with him  
 15 in March? Do you want to  
 16 rethink that?  
 17 MS. HARWIN: The  
 18 substance of her  
 19 communications with counsel  
 20 are privileged. In so far  
 21 as, your question has already  
 22 been answered on the record,  
 23 there is no need to  
 24 further --  
 25 MR. DROGIN: I haven't

1 G. C. ROBINSON  
 2 asked her what was  
 3 communicated. My question  
 4 wasn't answered on the  
 5 record, and even if it was, I  
 6 am allowed to ask it a second  
 7 time.  
 8 Q. At the time that you  
 9 received this letter, hadn't you  
 10 already conferred with Attorney  
 11 Pagano?  
 12 A. I had already connected  
 13 with Jeff Pagano.  
 14 Q. At the time that you  
 15 received this letter, you were aware  
 16 from Robin Chambers that Tiffany  
 17 Chen was conducting an investigation  
 18 into the use of Canal's expense  
 19 report, isn't that right?  
 20 A. I don't believe that is  
 21 correct.  
 22 Q. Well, at some point Robin  
 23 told you, in substance, hey Tiffany  
 24 is looking around at expenses.  
 25 Do you recall that?

1 G. C. ROBINSON  
 2 A. I can't recall from a  
 3 specific conversation that we had  
 4 unless --  
 5 Q. So in general, did you ever  
 6 become aware that Tiffany was asking  
 7 questions about your use of Canal  
 8 funds?  
 9 A. My specific use?  
 10 Q. Yes.  
 11 A. Not at that time, no.  
 12 Q. Okay.  
 13 Were you concerned when you  
 14 received this letter that Canal  
 15 might be conjuring up some sort of  
 16 false claims against you?  
 17 A. Yes, because it is filled  
 18 with nothing but false allegations,  
 19 and it is also --  
 20 Q. Hold on. Can you -- so  
 21 look at the letter, is there  
 22 anything --  
 23 A. Can I finish my responses?  
 24 Q. No. Your attorney can ask  
 25 questions. You said it was filled

1 G. C. ROBINSON  
 2 with falsehoods. Is there anything  
 3 in Tom Harvey's letter that is  
 4 correct, or is the entire thing  
 5 false?  
 6 A. The contents of it is  
 7 designed to intimidate me, to -- has  
 8 false allegations. It is -- it is  
 9 something that -- to threaten me, to  
 10 discourage me from moving forward  
 11 with my claims, that in my -- in the  
 12 e-mail that came with this, it was  
 13 -- that was sent, it states that I  
 14 will involve an attorney. And it is  
 15 also somebody who wrote this, Tom  
 16 Harvey, who was aware of my claims  
 17 and the harassment.  
 18 Q. Okay. And just getting  
 19 back to what I was asking.  
 20 Is there anything in this  
 21 letter that is accurate or is it all  
 22 false?  
 23 A. Are you asking me to go  
 24 through every single line of it?  
 25 Q. You have said that it is

1 G. C. ROBINSON  
 2 filled with falsehoods. I am just  
 3 wondering if anything in it is true,  
 4 or is that just an exaggeration on  
 5 your part?  
 6 A. The claims that Tom Harvey  
 7 makes in these letters are false.  
 8 Q. Okay.  
 9 And just so we are clear,  
 10 at the time that you received this,  
 11 you had counsel, correct?  
 12 A. As I stated before, yes.  
 13 Q. So when you talk about  
 14 being intimidated, you already had  
 15 counsel on your side, correct?  
 16 A. I don't think having  
 17 counsel negates the fact that this  
 18 was meant to threaten me, to create  
 19 these false allegations so that I  
 20 wouldn't move forward with my own  
 21 claims to -- yeah.  
 22 Q. Okay.  
 23 Now you gave Robin once an  
 24 example about how somebody could  
 25 turn something around against you if

1 G. C. ROBINSON  
 2 they wanted to. I am going to ask  
 3 you if you recall giving her this  
 4 example. You said that -- let me  
 5 break it down.  
 6 Wasn't there a time when,  
 7 in connection with [REDACTED], you had  
 8 Dyson vacuum cleaners sent to your  
 9 apartment and you had to pay your  
 10 doorman to accept them?  
 11 A. Yes, Bob directed me to  
 12 have things sent to my apartment  
 13 because Tiffany and Bob did not want  
 14 having things delivered to their  
 15 home since it was a townhouse and  
 16 there was no doorman. There were  
 17 multiple things that were shipped to  
 18 either the office and sent to my  
 19 house or to [REDACTED], and also directly  
 20 to my house, and --  
 21 (Simultaneous speaking)  
 22 Q. I want to make sure I  
 23 understand something.  
 24 Did you take any  
 25 independent action, whatsoever, in

1 G. C. ROBINSON  
2 your position as vice president of  
3 production and finance?

4 A. Can you clarify in regards  
5 to -- are you --

6 Q. Well --

7 A. What specifically?

8 Q. Sure. I will clarify.

9 You keep saying that Bob  
10 directed you. And it is a theme  
11 that you keep coming back to. Bob  
12 directed you. Bob directed all  
13 these people.

14 Did you have any  
15 independent autonomy to do anything,  
16 or were you just there to jump when  
17 he said jump and that was it?

18 A. As I said before, and I  
19 will give the example that Bob would  
20 continue to redirect my job to --

21 (Simultaneous speaking)

22 Q. I know. I would like to  
23 redirect you back to my question.  
24 You keep repeating this theme again  
25 and we will explain this to the

1 G. C. ROBINSON  
2 court. I am asking a different  
3 question. You keep saying he is  
4 directing and redirecting.

5 Do you have any independent  
6 authority, do you have any autonomy,  
7 do you do anything other than what  
8 he tells you to do?

9 MS. HARWIN: She should  
10 be allowed to answer the  
11 question.

12 MR. DROGIN: I just asked  
13 the question.

14 A. It was very difficult to  
15 have autonomy based on environment  
16 and -- the environment that Bob had  
17 created. I spoke to him at length  
18 about, you know, every topic and  
19 everything that was going on with  
20 Canal. One of my complaints was  
21 that --

22 Q. Stop. Please. I haven't  
23 ask you about your complaints. This  
24 is what you are doing. I don't want  
25 to hear about your complaints. I

1 G. C. ROBINSON  
2 just want to make a record that  
3 every single time somebody asks you  
4 a question, you don't answer it so  
5 the judge can see exactly what we  
6 have endured today that you will not  
7 answer questions directly. You are  
8 just returning to your narrative.  
9 Which is fine. Just don't expect  
10 that we are going to get done with  
11 this deposition any time soon.  
12 Please don't tell me how he  
13 redirected you.

14 I am asking about in your  
15 \$300,000 a year job as vice  
16 president of finance for Canal  
17 Productions, whether you had any  
18 autonomy or you were just a puppet  
19 for Robert De Niro?

20 A. It very little autonomy  
21 based on the fact that I wasn't  
22 doing the job that he and I  
23 discussed.

24 Q. Thank you. Okay.  
25 And he was micromanaging

1 G. C. ROBINSON  
2 you, is that fair? Is that fair, he  
3 was micromanaging you?

4 A. I would say at times, yes.

5 Q. As an example, he is Robert  
6 De Niro, he is just gotten back from  
7 California, he is made this  
8 announcement that he is getting a  
9 divorce, he is dealing with Tiffany,  
10 he is dealing with [REDACTED], and not  
11 withstanding that and his career, he  
12 needs to take the time to tell you  
13 how to coordinate to get vacuum  
14 cleaners delivered, is that your  
15 testimony?

16 A. Yes, because the issue was  
17 that they didn't want them delivered  
18 to the townhouse because somebody  
19 wasn't home all the time. Bob was  
20 aware that I had a doorman, and he  
21 had them sent directly, and his  
22 driver would call, and I would pick  
23 them up. That is an example.

24 Q. Okay.  
25 So he is down at the vacuum

1 G. C. ROBINSON  
 2 cleaner level with you.  
 3 Now didn't you tell Robin  
 4 that if one of the Dysons hadn't  
 5 been delivered, someone could have  
 6 accused you of stealing it?  
 7 A. I am not aware of that. I  
 8 can't recall off the top of my head.  
 9 Q. But when we are talking  
 10 about conjuring up claims, and you  
 11 said there was a concern that you  
 12 had, that they were going to conjure  
 13 up claims against you, is that the  
 14 type of thing that you meant?  
 15 A. I am not aware or I can't  
 16 recall that specific conversation so  
 17 unless you can, you know -- I can  
 18 see it within the context or that  
 19 there was a conversation there, I  
 20 can't really quite --  
 21 Q. That is okay. I assure you  
 22 there is a conversation there. I  
 23 wouldn't be bringing these things up  
 24 if there wasn't a conversation  
 25 there. You should assume that

1 G. C. ROBINSON  
 2 pretty much every question that I  
 3 ask you is based on your own words.  
 4 That is what we are going to use  
 5 against you here. Your own words.  
 6 Now Tom's letter identified  
 7 a number of items that he believed  
 8 you had improperly charged to Canal  
 9 as personal expenses.  
 10 Is that fair that that is  
 11 what it says? I know you don't  
 12 agree with it.  
 13 A. Those are claims that he  
 14 made, yes.  
 15 Q. You did have access to  
 16 Canal's American Express card,  
 17 didn't you?  
 18 A. Yes. As did other  
 19 employees.  
 20 Q. Yes. But for the moment I  
 21 am just going to confine myself to  
 22 you. Okay? Okay?  
 23 A. Okay.  
 24 Q. Did you have access to any  
 25 other corporate credit cards or

1 G. C. ROBINSON  
 2 debit cards?  
 3 A. Yes.  
 4 Q. Okay.  
 5 And what were they?  
 6 A. I had access to Toukie  
 7 Smith's Canal American Express,  
 8 Michael Kaplan. These were all  
 9 things that Michael Kaplan --  
 10 specifically that other employees  
 11 had. And also Toukie Smith as well.  
 12 Q. But are these Canal  
 13 American Express cards with  
 14 individual users, is that what you  
 15 are saying?  
 16 A. Yes.  
 17 Q. There was also a master  
 18 account, correct?  
 19 A. Yes.  
 20 Q. And you were the one that  
 21 had access to the master account,  
 22 correct?  
 23 A. I don't -- I wouldn't  
 24 characterize it that way.  
 25 Q. How would you characterize

1 G. C. ROBINSON  
 2 it?  
 3 A. The main account holder and  
 4 credit card was under Robert De  
 5 Niro. There was several credit  
 6 cards for Bob's business,  
 7 operational business needs, or  
 8 expenses, operational, personal.  
 9 Dan Harvey had a credit card, Canal  
 10 American Express's credit card, and  
 11 also Toukie Smith, Bob's  
 12 ex-girlfriend had a Canal American  
 13 Express.  
 14 Q. Did you have any  
 15 responsibilities regarding the use  
 16 of this American Express card, like  
 17 paying the bills or verifying  
 18 charges, or anything like that?  
 19 A. Both Michael Kaplan and I  
 20 reviewed bills when they were sent  
 21 to us.  
 22 Q. For what purpose did you  
 23 review the bills?  
 24 A. We reviewed the bills to --  
 25 to look over the charges, but we

1 G. C. ROBINSON  
2 weren't the only people who had eyes  
3 on the American Express card.

4 Q. Did you ever sit down with  
5 Dan Harvey to review the American  
6 Express bills?

7 A. No.

8 Q. Now, on occasion, would you  
9 ever charge personal expenses on the  
10 American Express card?

11 A. I can't recall a time where  
12 I would have placed anything that  
13 was personal unless it was an  
14 accident.

15 Q. And if it was an accident,  
16 assuming it happened, you would  
17 reimburse Canal, is that fair?

18 A. I would, and I have  
19 reimbursed Canal for an accidental  
20 charge that I can recall. And I  
21 also reversed charges when I  
22 realized the mistake I had made.  
23 Both my American Express and Canal's  
24 American Express look exactly the  
25 same.

1 G. C. ROBINSON

2 Q. So sometimes mistakes would  
3 be made, and we should be able to  
4 identify what you reimbursed Canal  
5 for by looking at the records,  
6 correct?

7 A. At the -- at the  
8 reimbursements or the refund on it  
9 if I had made a mistake, which I can  
10 recall one, I -- in addition there  
11 was a check that I had sent to  
12 Burton for something that I had seen  
13 that I had charged accidentally to  
14 the credit card. I had sent Burton  
15 a check.

16 Q. I am not suggesting there  
17 is anything wrong with that.  
18 Sometimes -- I have a firm credit  
19 card, and sometimes I use it and I  
20 reimburse the firm. I am not  
21 suggesting that you did anything  
22 wrong. I am just saying that  
23 sometimes there might be personal  
24 expenses on there, and there would  
25 be a reason for it, correct?

1 G. C. ROBINSON

2 A. I can't recall what  
3 personal expenses I would have put  
4 on Canal production credit card.

5 Q. So is it fair to assume  
6 that if there were charges put on  
7 the Canal American Express they were  
8 business expenses, correct?

9 A. They were business  
10 expenses, or related to Canal, or  
11 something that had an expense that  
12 Bob had approved.

13 Q. Okay.

14 Let me turn now to one of  
15 the things that Tom talks about in  
16 his letter and that is SkyMiles.

17 Am I correct that the use  
18 of the American Express credit card  
19 would generate credits or points  
20 that could then be converted in  
21 Delta SkyMiles, is that fair?

22 A. Yes, American Express  
23 credit cards.

24 Q. And Canal had a SkyMiles  
25 account, and then you had your own

1 G. C. ROBINSON

2 SkyMiles account, is that right?

3 A. There were several Delta  
4 accounts, including one for Robert  
5 De Niro, one that was mine, and one  
6 for Dan Harvey.

7 Q. Okay.

8 And one of the perks that  
9 you had during your employment was  
10 if you were traveling, personally,  
11 on vacation, or something like that,  
12 you could use Canal's SkyMiles,  
13 isn't that right?

14 A. I wouldn't characterize it  
15 that way, but one -- I wouldn't  
16 characterize it that way.

17 Q. Well, you did -- during  
18 your employment, you did use Canal's  
19 SkyMiles, didn't you?

20 A. Yes, that -- and Bob  
21 approved of that.

22 Q. That was -- part of your  
23 employment was that one of the perks  
24 was you could travel on Canal's  
25 SkyMiles, do I understand that



1 G. C. ROBINSON

2 right?

3 A. Yes, with Bob's -- it was  
4 approved by Bob.

5 Q. Was that in writing  
6 anywhere? I am not questioning that  
7 that existed. I am asking if it was  
8 memorialized in writing anywhere  
9 because I know you made copious  
10 notes and records on things.

11 A. I can't recall any specific  
12 e-mails or it being written.

13 Q. Okay.  
14 You knew about this, and  
15 Bob knew about this, is that right?

16 A. Yes.

17 Q. Who else, if anyone, knew  
18 about that arrangement?

19 A. Michael Kaplan -- they  
20 include Michael Kaplan, Robin  
21 Chambers, I believe Olivia was  
22 aware. I believe some of the  
23 executive assistants were aware.  
24 Michael Tasch, Mark Bosswick, and  
25 also Tom Harvey.

1 G. C. ROBINSON

2 Q. Now at some point, in  
3 January of 2019, you placed a call  
4 and asked about the maximum number  
5 of SkyMiles that could be  
6 transferred from one account to  
7 another, isn't that right?

8 A. I can't recall my specific  
9 conversation with American Express  
10 at that time.

11 Q. Do you know how many  
12 SkyMiles could be transferred in any  
13 24-hour period?

14 A. 999,000.

15 Q. Per day?

16 A. Per day.

17 Q. How do you know that?

18 A. It was something -- it had  
19 come up in a conversation when I was  
20 trying to transfer points with Delta  
21 at some point.

22 Q. And in beginning of January  
23 of 2019, up until the date that you  
24 resigned, did you, in fact, transfer  
25 some Canal SkyMiles into your

1 G. C. ROBINSON

2 personal SkyMiles account?

3 A. Yes, as I said -- as I had  
4 done with Bob's approval.

5 Q. When you say as you had  
6 done, isn't it true that when you  
7 use them, on some occasions, you  
8 would transfer the actual amount  
9 that you needed for the particular  
10 airplane flight or whatever it was?

11 A. No, that is not correct.

12 Q. So each time you needed to  
13 use SkyMiles, you would just move  
14 999,000, is that right?

15 A. No, that is not correct.

16 Q. So then, before January of  
17 2019, if you needed a certain number  
18 of SkyMiles, how would you go about  
19 transferring them into your account?

20 A. I would transfer the  
21 balance of the SkyMiles into my  
22 account, at times where Bob and I  
23 had discussed, and he had approved  
24 of my trip and my travel.

25 Q. Okay.

1 G. C. ROBINSON

2 And would you transfer the  
3 amount that you needed or just  
4 whatever amount you saw fit?

5 A. I wouldn't characterize it  
6 that way.

7 Q. Well, was there any  
8 limitation on the number of SkyMiles  
9 that you would use for a particular  
10 trip where he had approved the use  
11 of it?

12 A. I would transfer the  
13 balance of the SkyMiles account into  
14 my Delta account.

15 Q. So are you saying you would  
16 empty Canal's SkyMiles account into  
17 your personal account, is that what  
18 you are saying?

19 A. It is the same that Michael  
20 Kaplan did when he transferred them  
21 out of Bob's black card into Bob's  
22 Delta SkyMiles. It was -- we would  
23 transfer what was available.

24 Q. I am just talking about you  
25 now. I am not talking about



1 G. C. ROBINSON  
2 whatever arrangement Michael Kaplan  
3 might have had.

4 Do you know how many  
5 SkyMiles you transferred from  
6 Canal's account to your personal  
7 account between January of 2019, and  
8 the day that you resigned?

9 A. I don't know the amount.

10 Q. Okay.

11 Would it surprise you if I  
12 told you the records show that you  
13 transferred just under 4.5 million  
14 SkyMiles?

15 A. I don't know the amount.

16 Q. I understand that. My  
17 question is -- I will ask it a  
18 different way.

19 There were five transfers  
20 of 999,000 SkyMiles made from the  
21 Canal account to your personal  
22 account, between January 28, 2019,  
23 and March 18th, 2019.

24 Does that refresh your  
25 recollection any -- does that

1 G. C. ROBINSON  
2 refresh your recollection you have  
3 about transfers that you made  
4 between January and the day that you  
5 resigned?

6 A. I don't know specifically  
7 as I said to the amounts -- the  
8 amount of points that were  
9 transferred.

10 Q. Okay.

11 But you were transferring  
12 miles to your personal account,  
13 correct?

14 A. Yes, with Bob's approval.

15 Q. You are saying that he had  
16 made specific approval for each of  
17 those transfers, what are you  
18 saying?

19 A. For the overall of  
20 transferring the points into my  
21 Delta SkyMiles account, he and I had  
22 discussed it on multiple occasions,  
23 including a time in I believe in  
24 2019, where Bob, himself, was  
25 frustrated that I did not have the

1 G. C. ROBINSON  
2 access to transfer miles.

3 Q. Let's go back to my  
4 question. Let's go back to January  
5 of 2019.

6 During the period of time  
7 in January, that was the point in  
8 time that you were -- you testified  
9 you were in such acute pain because  
10 of your back. Weren't you also  
11 talking to Robin Chambers about the  
12 fact that you were thinking about  
13 resigning?

14 A. No.

15 Q. During the period of time  
16 that transfers were made, between  
17 January and the time that you  
18 resigned, weren't you contemplating  
19 resigning?

20 A. No, quite the opposite. I  
21 was trying to reach out to my  
22 employer to fix any issues and speak  
23 to him about any problems. I had  
24 reached out to him several times  
25 about that.

1 G. C. ROBINSON  
2 Q. Do you recall having any  
3 conversations with Robin where you  
4 were talking about resigning during  
5 that period of time?

6 A. During the period, just to  
7 clarify, January through April?

8 Q. January 28th, 2019, which  
9 was the day of the first transfer,  
10 up until April 6th, which was the  
11 day of your resignation?

12 A. I can't recall a  
13 conversation with her about it about  
14 resigning. It was a very toxic and  
15 abusive work environment, but -- and  
16 I was in pain, but I don't recall  
17 specifically talking to her about  
18 resigning because I didn't -- I  
19 didn't think about resigning my  
20 position until much later.

21 Q. And was there ever a  
22 conversation with you and Mr. De  
23 Niro about what would happen to  
24 SkyMiles after you left the company,  
25 did that ever come up?

1 G. C. ROBINSON

2 A. I can't recall us ever  
3 discussing that.

4 Q. Do you recall having a  
5 conversation with Robin Chambers  
6 where you told her that Tom Harvey  
7 had accused you of stealing  
8 SkyMiles?

9 A. There was a conversation at  
10 some point where Tom Harvey had told  
11 me that Bob was upset about the  
12 SkyMiles, and also said that he knew  
13 that I used them.

14 Q. I know all of that. But I  
15 am talking about the conversation --  
16 a conversation you had with Robin  
17 Chambers, where you explained to her  
18 that Tom Harvey was accusing you of  
19 stealing the SkyMiles. Do you have  
20 any recollection of that  
21 conversation?

22 A. I have recollection of a  
23 conversation about the SkyMiles  
24 after I got off the phone with Tom  
25 Harvey, where he --

1 G. C. ROBINSON

2 Q. I am not asking about that.  
3 Please don't tell me about Tom  
4 Harvey. If you remember it -- I can  
5 play it for you if you want.

6 Do you remember a  
7 conversation with Robin Chambers,  
8 where you told her, "Tom Harvey is  
9 accusing me of stealing the  
10 SkyMiles?"

11 A. I don't recall the exact  
12 words that I used that I had  
13 discussed with her about the  
14 SkyMiles.

15 Q. I am not asking for the  
16 exact words. I am just asking if  
17 you remember having a conversation  
18 with her about it.

19 A. I believe I just answered  
20 that, and said that I do recall a  
21 conversation where we discussed the  
22 SkyMiles.

23 Q. And didn't she tell you,  
24 "Chase, it is like a computer, you  
25 can use it while you are working,

1 G. C. ROBINSON  
2 but you can't take it with you,"  
3 isn't that what she told you?

4 A. I can't recall the  
5 specifics of what he she said, but I  
6 wouldn't characterize it in that way  
7 myself.

8 Q. Well, if you can't tell me  
9 the specifics of what she said, how  
10 can you tell me how you would  
11 characterize it?

12 A. Because you just quoted  
13 her, supposedly, in saying that it  
14 was like a computer. So I don't  
15 characterize the SkyMiles in that  
16 way. Once you transfer the SkyMiles  
17 you can't transfer them back.

18 Q. Right.

19 So what you are telling me  
20 then -- I want to make sure I  
21 understand what is going on in your  
22 head.

23 If Robin told you, in  
24 substance, "Chase, it is like a  
25 computer, you can use it while you

1 G. C. ROBINSON

2 are working, but you can't take it  
3 with you," that is not something  
4 that you see? You see it  
5 differently, is that correct?

6 A. No. As I said, I wouldn't  
7 characterize it that way because  
8 SkyMiles are not a computer. And  
9 once you transfer the SkyMiles, you  
10 cannot transfer them back.

11 Q. Okay.

12 So since you can't transfer  
13 them back, is it fair to say that  
14 you never tried to transfer them  
15 back?

16 A. At this time once I had had  
17 -- Tom Harvey had sent this letter,  
18 anything that I had discussed about  
19 the SkyMiles would be privileged.

20 Q. I am not understanding your  
21 answer. Did you ever try to  
22 transfer them back is the question  
23 simply, yes or no?

24 A. I was aware that you could  
25 not transfer them back. So,

1 G. C. ROBINSON  
2 therefore, I didn't try to transfer  
3 them back on something that I knew  
4 could not be transferred back.

5 Q. And again, Tom's letter, at  
6 the bottom of page one, he wrote, "I  
7 strongly suggest you speak to an  
8 attorney and return the SkyMiles  
9 immediately."

10 Do you see that?

11 A. Yes.

12 Q. And at that point you had  
13 spoken with an attorney, correct?

14 A. I had been in contact with  
15 an attorney.

16 Q. And at that point in time  
17 when you got the letter, were you  
18 already aware that you couldn't  
19 return the SkyMiles or did you learn  
20 that later?

21 A. When you call to transfer  
22 the SkyMiles, they gave you -- it is  
23 like a disclaimer about how when you  
24 transfer them, you cannot transfer  
25 them back. It is something that you

1 G. C. ROBINSON  
2 -- from transferring SkyMiles as --  
3 you know I am aware.

4 (Simultaneous speaking)

5 Q. It's like Hilton. You get  
6 on the phone, where you have a  
7 reservation, and you get on the  
8 phone, you find the right person,  
9 and you make a few calls. You say,  
10 listen, "Mr. De Niro is accusing me  
11 of stealing this stuff, I need to  
12 get it back."

13 Did you ever try to do  
14 that?

15 A. No, I didn't try to call  
16 where I knew that once you transfer  
17 it, you cannot transfer it back.  
18 This would have been something -- a  
19 topic that we spoke about during the  
20 transition if it had been finalized.

21 Q. Okay. Did not attempt to  
22 transfer them back. Okay.

23 Are you aware of whether in  
24 any of Mr. Pagano's e-mails, he ever  
25 indicated that there was no way to

1 G. C. ROBINSON  
2 return the SkyMiles? I am talking  
3 about the -- in the e-mail that he  
4 is written that you have seen that  
5 -- let me be clear, that you sent  
6 back to me?

7 A. I have -- I can't recall.

8 Q. In Tom's letter, he also  
9 indicated that he believed you were  
10 in possession of cash belonging to  
11 Canal, isn't that right?

12 A. In his letter, he did state  
13 that.

14 Q. Okay.

15 And at the time that you  
16 received the letter, you were in  
17 possession of cash belonging to  
18 Canal, weren't you?

19 A. Yes.

20 Q. How much cash, belonging to  
21 Canal, were you in possession of at  
22 the time that you received this  
23 letter?

24 A. I can't recall the specific  
25 amounts in the Toukie Smith petty

1 G. C. ROBINSON  
2 cash or the Canal petty cash.

3 Q. I am just talking about  
4 Canal. When Tom asked you --  
5 mentioned that you were in  
6 possession of cash, whatever you  
7 understood that to mean, do you  
8 remember the approximate amount of  
9 cash?

10 A. I don't know what the  
11 approximate amount of those two  
12 petty cashes were.

13 Q. And in it, in his letter,  
14 he asks at the bottom here, right  
15 before the bottom of page two, "I  
16 strongly urge you to mitigate the  
17 damages that you have caused and  
18 return the various computers,  
19 iPhones, cameras, and other property  
20 in your possession that belongs to  
21 Canal."

22 Do you see that?

23 A. Yes.

24 Q. When did you return the  
25 cash, and how much did you return?

1 G. C. ROBINSON  
2 A. It was returned with the  
3 rest of Canal Productions's property  
4 that was in my possession, I  
5 believe, November 5th of this year.

6 Q. Okay.  
7 So Tom asked you to return  
8 this in July of 2019, correct?

9 A. I wouldn't --

10 Q. Correct?

11 A. I wouldn't --

12 Q. It is okay. You can say  
13 it.

14 A. I wouldn't put the context  
15 of this.

16 Q. Earlier I asked you -- at  
17 the beginning of the deposition, I  
18 asked if you understood the oath,  
19 and that if some answers that you  
20 gave were going to be hurtful to  
21 your case, and you agreed to be  
22 truthful.

23 I'm asking you now, didn't  
24 you hold on to Canal's cash for more  
25 than two years before you returned

1 G. C. ROBINSON  
2 it, yes or no?

3 A. Yes, but I don't think that  
4 is the context of why the -- I had  
5 the possession of the property.

6 MR. DROGIN: I move to  
7 strike everything you said  
8 after the word "yes."

9 Q. Is there a reason why you  
10 returned the cash in November of  
11 2021?

12 A. I don't know how to answer  
13 that without discussing something  
14 that was -- that was privileged.

15 Q. Okay.

16 So I think we can infer  
17 from that that your attorney told  
18 you to return the cash, but I can't  
19 ask you about that because it is  
20 privileged, so that is okay. We  
21 will move on.

22 How much cash did you  
23 return?

24 A. All of the Canal and Toukie  
25 Smith petty cash that I had had. I

1 G. C. ROBINSON  
2 don't recall the amount.

3 Q. So when you returned this  
4 cash, you don't even know how much  
5 you returned?

6 A. Off the top of my head, I  
7 can't recall the amount.

8 Q. Can you approximate how  
9 much cash you had?

10 A. I don't want to guess.

11 Q. I am not asking you to  
12 guess. I am asking you to  
13 approximate?

14 A. I don't know the amount.

15 Q. Would it surprise you if it  
16 was more than \$10,000?

17 A. I don't believe it was  
18 \$10,000, but again, I will state  
19 that I do not recall the amount of  
20 the petty cash.

21 Q. Now Tom also mentioned to  
22 you in his letter that he believed  
23 that you were in possession of  
24 certain gift cards belonging to  
25 Canal.

1 G. C. ROBINSON  
2 Do you see that?

3 A. What line is that under or  
4 what paragraph?

5 Q. It is in Paragraph 3. It  
6 says, "These include food,  
7 transportation, such as Uber and  
8 taxis, dog sitting, groceries,  
9 cameras, iPhones, subscriptions to  
10 magazines, and newspapers, Pilates  
11 classes, dry cleaning, flowers for  
12 your residence, an unknown number of  
13 gift cards, and helped yourself to  
14 petty cash."

15 I am talking about the gift  
16 card part of this.

17 A. Can you repeat your  
18 question?

19 Q. At the time that you  
20 received that letter, did you, in  
21 fact, have gift cards belonging to  
22 Canal?

23 A. Yes, I had gift cards. But  
24 what -- the line that you are  
25 referring to in the letter is him

1 G. C. ROBINSON  
2 making a claim that I had used an  
3 unknown number of gift cards for my  
4 personal expenses.

5 Q. Right. But I'm not asking  
6 that question. I am just asking  
7 whether you had Canal gift cards in  
8 your possession at the time that you  
9 received the letter?

10 A. Yes, I had gift cards  
11 amongst other items here at the --  
12 the approved office that I had. My  
13 office was here in my home.

14 Q. So the answer to my  
15 question is yes, you had Canal gift  
16 cards, correct?

17 A. Okay.

18 Q. Did you ever return those  
19 gift cards?

20 A. They were returned with the  
21 rest of the Canal items.

22 Q. So they were returned in  
23 November of 2021?

24 A. Yes.

25 Q. And Tom, in his letter,

1 G. C. ROBINSON  
2 asked you to return them in July of  
3 2019, isn't that right?

4 A. Yes. But he was also aware  
5 that I had items in my possession  
6 that were Canal's, and that he was  
7 handling my transition, and in no  
8 point did he finalize my transition  
9 before he sent this threatening  
10 letter with false allegations in it.

11 MR. DROGIN: Move to  
12 strike everything you said  
13 after the word yes.

14 Q. Do you know the dollar  
15 value of the gift cards that you  
16 returned?

17 A. I am not aware off the top  
18 of my head what the value of it was.

19 Q. Would it surprise you that  
20 based on the ones that we can tell  
21 it was over \$19,000 in gift cards;  
22 would that come as a shock to you?

23 A. Again, I don't recall the  
24 total amount, but I would take your  
25 word for it.

1 G. C. ROBINSON  
2 Q. But before returning the  
3 cash, you didn't think to count it,  
4 correct?

5 A. I believe that there is  
6 documentation somewhere what was  
7 returned.

8 Q. Okay.

9 Is that documentation that  
10 you prepared?

11 MS. HARWIN: Without  
12 disclosing anything that is  
13 attorney-client privilege.

14 Obviously you are not to  
15 disclose any attorney-client  
16 privileged communications.

17 MR. DROGIN: We can  
18 specifically ask her whether  
19 there was inventory. So if  
20 there was an inventory  
21 prepared by the witness, I  
22 think we are entitled to it.

23 MS. HARWIN: Counsel, you  
24 know there was a deadline on  
25 Friday for the information as

1 G. C. ROBINSON  
2 to an inventory, and we will  
3 comply with the Court's  
4 deadline.

5 MR. DROGIN: So we will  
6 leave that open. We will  
7 leave that part of this open.

8 Q. So just so I don't lose my  
9 train of thought, so you didn't  
10 count up the amount of the gift  
11 cards that you were returning, is  
12 that right?

13 A. I can't recall the amount  
14 of the gift cards that were  
15 returned.

16 Q. I know that. And that is  
17 because you didn't count them, isn't  
18 that right?

19 A. No, I would not say that is  
20 correct. But again --

21 Q. If you counted them, then  
22 you would know, right? If you  
23 counted the gift cards, then you  
24 would know the value of the gift  
25 cards, right?

G. C. ROBINSON

A. (No verbal response.)

Q. Correct? I am not trying to trick you here. I know the answer is obvious, but it is not a trick question.

A. I don't know the total amount of the gift cards off the top of my head.

Q. So just to go back to this theory that you were concerned about, that Canal was conjuring up claims against you, so had you returned the cash, when it was requested, Canal could have said, "Hey, wait, where is the rest of the cash? This is only \$5,000, and we think you have more." They could have made up a fake claim like that, right?

A. I can't speculate on something unless you give me an example of it or on just what could have --

Q. Let's take as an example

G. C. ROBINSON

where you have an employer's property and they ask for it back and you don't return it. The employer can say, "What about the rest of the property? You stole the rest of the property. You gave me back this, but you didn't give me that back." They could have conjured up that claim, right?

A. I can't speculate on a hypothetical on something that has -- is not something in front of me with this -- with what Canal Productions had done.

Q. Do you remember having a conversation with Robin Chambers about the property that you had retained?

A. I can't recall a specific conversation. We have had many conversations over the years and during that period of time.

Q. Did Robin Chambers ever tell you in one of those phone

G. C. ROBINSON

calls, "I think you should give it back?"

A. No, I can't recall that that that was discussed or that she said that. But, again, we had many conversations over that period of time. In the -- during that time I was in transition and speaking to Tom Harvey about it. E-mails went to Bob about the transition that it would take me a while to put things together. I had never finalized anything with Tom Harvey, and then I was sent this threatening letter with false allegations.

Q. Right. I got that.

So you resigned on April 6th, and July 11th you are asked to return the property, and you returned it in November, two years later, is that factually correct?

A. Yes, but without context.

Q. Okay. Camera equipment.

On November 5th, 2021, you

G. C. ROBINSON

returned camera equipment, is that correct?

A. Yes.

Q. Is that camera equipment that belonged to Canal?

A. Yes.

Q. Okay.

Where -- was this stuff all kept together, like the gift cards, the cash, camera equipment, was this all kept in one place?

A. During Canal they were kept at my office for Canal, which was approved to be my home.

Q. Okay.

So they were at home with you. And did they stay there until they were returned, or did they go somewhere else in between?

A. I preserved the items here. They were here.

Q. So when they were shipped back to Canal, they were shipped from your home?



1 G. C. ROBINSON  
 2 A. They went from my home to  
 3 Greg's office.  
 4 Q. Okay.  
 5 So a trucking company came,  
 6 physically picked up the items, and  
 7 delivered them to Mr. Bennett's  
 8 office?  
 9 A. I'm sorry. Can you just  
 10 repeat --  
 11 Q. I am trying to figure out  
 12 the chain of custody, whether this  
 13 ever went through your attorneys, or  
 14 it simply left your apartment and  
 15 went to Mr. Bennett's firm?  
 16 A. It went from my apartment  
 17 to Mr. Bennett's firm.  
 18 Q. Did you -- the camera  
 19 equipment that you had, why didn't  
 20 you return it sooner?  
 21 A. As I stated, I was in  
 22 transition with Tom Harvey regarding  
 23 all of this stuff. After I resigned  
 24 I had not heard back from Tom Harvey  
 25 about finalizing any of the

1 G. C. ROBINSON  
 2 transition, and then I was sent this  
 3 threatening, false letter.  
 4 Q. Well, actually, after this  
 5 letter, that you are characterizing  
 6 as threatening and false, actually a  
 7 lawsuit was started against you.  
 8 Isn't that right?  
 9 A. A retaliatory lawsuit was  
 10 started against me.  
 11 Q. Well, retaliatory is not --  
 12 that is a conclusion. At the  
 13 moment, let's just call it the  
 14 lawsuit and not put labels on it. I  
 15 won't call you a thief, even though  
 16 I think you stole. I will give you  
 17 the respect of, you know, just  
 18 keeping it at arm's length.  
 19 MS. HARWIN: Counsel,  
 20 that is inappropriate.  
 21 MR. DROGIN: What is  
 22 inappropriate?  
 23 MS. HARWIN: Just ask  
 24 your question.  
 25 MR. DROGIN: I am. I am

1 G. C. ROBINSON  
 2 trying to. I just don't  
 3 appreciate statements being  
 4 added onto very simple  
 5 questions.  
 6 Q. The question was, wasn't  
 7 the lawsuit started?  
 8 A. Canal filed a lawsuit on  
 9 August 17th, Bob's birthday, 2019.  
 10 Q. In other words, the answer  
 11 to my question is yes?  
 12 A. I have stated that, I  
 13 believe, twice now.  
 14 Q. So at that point would you  
 15 say that your communications in this  
 16 winding down with Tom Harvey had  
 17 come to a conclusion?  
 18 A. Yes.  
 19 Q. But still, when the lawsuit  
 20 was filed in 2019, you still didn't  
 21 return all of this loot. Why not?  
 22 A. I wouldn't characterize it  
 23 that way.  
 24 Q. Okay.  
 25 Why didn't you return

1 G. C. ROBINSON  
 2 Canal's property?  
 3 A. Again, it would go to  
 4 privileged conversation that I had  
 5 with my attorneys.  
 6 Q. Wow. You know, there is a  
 7 crime fraud exception to the  
 8 attorney-client privilege? And this  
 9 could be construed as stolen  
 10 property. If you are going to tell  
 11 me that your attorney counseled you  
 12 to retain property that didn't  
 13 belong to you, we are going to have  
 14 to leave that open. We will move  
 15 on.  
 16 MS. HARWIN: Counselor,  
 17 the speeches are wildly  
 18 inappropriate.  
 19 MR. DROGIN: I think they  
 20 --  
 21 (Simultaneous speaking)  
 22 MS. HARWIN: Ask your  
 23 question.  
 24 (Whereupon, a recess was  
 25 taken at this time.)



G. C. ROBINSON

MS. HARWIN: Before we begin, I want to note for the record that a lot of the questioning has been filled with speeches, attacks, interruption, and intimidation tactics. We object to that, and we will object to the continuation of the deposition if you continue to fill your time with that.

MR. DROGIN: Okay. Does that mean that if I don't, you will consent to the continuation of the deposition, or are you going to object anyway?

MS. HARWIN: We will see where you end today.

MR. DROGIN: I am going to probably ask three more questions, and ask them really politely.

G. C. ROBINSON

Q. Ms. Robinson, after you received the letter from Tom Harvey, on July 11, did you speak with Mr. Harvey at any time before Canal started its lawsuit against you?

A. I don't believe I did.

Q. Back in November, one of the items that you returned to Canal was on iPhone, is that correct?

A. Yes.

Q. Did you ever access that iPhone on or after April 6th, 2019?

A. Yes.

Q. When, and for what purpose? And if when is many times, then just tell me what purpose.

A. I recall accessing it to make sure that when giving it to the tech vendor that they were going to give us a correct phone and the password was correct. That I was given the correct information.

Q. Anything else that you did on that phone?

G. C. ROBINSON

A. Not that I recall during that -- that time.

Q. And same question regarding an external hard drive that you returned. Did you access that external hard drive after you resigned?

A. I can't recall except for when handing the stuff over to the tech vendor, making sure there was no password on the phone. I can't recall accessing it.

Q. On the iPhone, what -- what mailboxes were there?

A. The -- I can't recall. It is a clone copy of Bob's phone that he gave me for the work on the divorce. I don't know. I believe his -- his e-mail, but I don't know what other mailbox -- inboxes there were.

Q. So you are saying, physically, the phone was his?

A. It was a clone copy of his

G. C. ROBINSON

iPhone.

Q. So the iPhone that you had was a clone of his. It was -- was it one that you used?

A. It was one that was given to me to take the information and give it to [REDACTED], Bob's divorce attorney. It was something that was for that -- for that purpose, for that project.

Q. Okay.

So just for clarification, the iPhone that you returned was not one that you used as part of your job, is that correct?

A. That is correct.

Q. I am not trying to trick you. I am just trying to understand.

A. As I said, that is correct.

Q. Okay. Good.

And what about text accounts, were there any accounts there, other than Bob's, I guess

1 G. C. ROBINSON  
2 that assumes the fact that you have  
3 -- were Bob's text accounts on that  
4 phone?

5 A. I can't recall off the top  
6 of my head, other than that it was a  
7 clone copy of Bob's phone. So  
8 whatever was on his phone and I -- I  
9 believe it was his texts. But I  
10 don't know if there was other --

11 Q. Okay. Thank you.

12 MR. DROGIN: Hopefully my  
13 behavior during the last  
14 three minutes did not offend  
15 or intimidate anyone. Can we  
16 talk about how we want to  
17 proceed? Because this is a  
18 logical breaking point. I  
19 know we have some additional  
20 time left today. There are a  
21 couple of open issues. We  
22 have had conversations with  
23 the judge about additional  
24 time. Do you want to discuss  
25 that on the record, off the

1 G. C. ROBINSON  
2 record, do you have a  
3 position on that?

4 MS. HARWIN: I believe  
5 that, you know, counsel  
6 should finish the questioning  
7 today and use its time, and  
8 then, you know, if there are  
9 any questions that you  
10 contend have been prevented  
11 from asking, you know, we  
12 will meet and confer with you  
13 about that.

14 MR. DROGIN: I think that  
15 the point that we are making,  
16 and I think the point that  
17 the judge understood, was  
18 that it was going to be  
19 impossible to finish in one  
20 day. The question is  
21 whether, now, at 6:00 p.m.,  
22 everybody wants to push on  
23 for another 45 minutes on the  
24 record, and then have a  
25 discussion about a second day

1 G. C. ROBINSON  
2 or whether we want to pause  
3 here, at 6:00, and then have  
4 that discussion? I am not  
5 suggesting that we are going  
6 to need an additional seven  
7 hours. I am just asking if  
8 you want to break here. That  
9 is all I am asking. I am  
10 fine either way.

11 MS. HARWIN: Why don't we  
12 take a five-minute break and  
13 then we can address that?

14 MR. DROGIN: Okay.

15 (Whereupon, a recess was  
16 taken at this time.)

17 MR. DROGIN: So it is --  
18 I have 6:07 here in New York.  
19 We have been on the record,  
20 according to Ms. Hayden, for  
21 six hours and 20 minutes. We  
22 are agreeing, without  
23 prejudice to adjourn for the  
24 day, with the understanding  
25 that we have 40 minutes

1 G. C. ROBINSON  
2 remaining, and then we will  
3 attempt to meet and confer to  
4 determine how much additional  
5 time we would like with Ms.  
6 Robinson. Ms. Harwin, is  
7 that fair?

8 MS. HARWIN: We  
9 understand that you want to  
10 adjourn for the day, we are  
11 agreeing to adjourn, and we  
12 will meet and confer with  
13 you, as to directed by the  
14 Court, concerning your  
15 request for additional time.  
16 And we would ask you to  
17 identify for us what it is  
18 that you contend requires  
19 additional time, and how  
20 much, and we will be prepared  
21 to meet and confer with you  
22 about that.

23 I will note for the  
24 record that pursuant to  
25 Federal Rule 30E, Plaintiff

1 G. C. ROBINSON  
 2 requests review of her  
 3 deposition transcript. We  
 4 will reserve signature  
 5 following the review of her  
 6 deposition. And I will also  
 7 note pursuant to Paragraph 1  
 8 of the Protective Order in  
 9 this case that we will advise  
 10 counsel on the record that  
 11 within 30 days after the  
 12 completion of Plaintiff's  
 13 deposition as to the  
 14 confidentiality designation.  
 15 And I just remind everyone  
 16 that during the 30-day period  
 17 following this deposition,  
 18 the entirety of the  
 19 deposition transcript is to  
 20 be treated as confidential.  
 21 MR. BENNETT: Before we  
 22 go off the record, if you  
 23 have not -- I guess I am  
 24 going to ask, have you sent  
 25 the one exhibit that I

1 G. C. ROBINSON  
 2 circulated to you to your  
 3 client as of yet?  
 4 MS. HARWIN: Let me  
 5 check. I don't recall. Can  
 6 you tell me which exhibit  
 7 number that was?  
 8 MR. BENNETT: 6478.  
 9 MS. HARWIN: I don't  
 10 believe I did. There was  
 11 only -- it was Exhibits A, B,  
 12 and C. The ones that we went  
 13 on the record with were the  
 14 ones that were sent to Ms.  
 15 Robinson.  
 16 MR. BENNETT: Okay. I  
 17 would just ask that you hold  
 18 onto it.  
 19 MS. HARWIN: That's fine.  
 20 MR. DROGIN: For  
 21 clarification, I am prepared  
 22 to move on and do the  
 23 additional 40 minutes. I  
 24 really thought it was just  
 25 for the convenience of the

1 G. C. ROBINSON  
 2 parties. I thought we were  
 3 agreeing to this. I didn't  
 4 -- I am not formally  
 5 requesting it. I just  
 6 thought it was good for  
 7 everybody, and everybody was  
 8 in agreement on that. I am  
 9 not looking to make  
 10 additional problems or  
 11 hurdles for myself later  
 12 where you say that we  
 13 insisted or something like  
 14 that.  
 15 MS. HARWIN: You  
 16 requested to adjourn for the  
 17 day, and we are amenable to  
 18 doing that. We are going to  
 19 meet and confer about your  
 20 request for additional time  
 21 as directed by the Court.  
 22 MR. DROGIN: But are you  
 23 saying that we no longer have  
 24 40 minutes, are you waiving  
 25 our 40 minutes? If that i

1 G. C. ROBINSON  
 2 your position, then I don't  
 3 want to stop.  
 4 MS. HARWIN: I think we  
 5 will consider that 40  
 6 minutes, as well as your  
 7 request for additional time.  
 8 I understand that you are  
 9 seeking more time beyond the  
 10 40 minutes.  
 11 MR. DROGIN: I am. But I  
 12 don't want to waive the 40  
 13 minutes. And I am sort of  
 14 not like getting a warm and  
 15 fuzzy feeling from you.  
 16 MS. HARWIN: Our position  
 17 is that if the Court entitles  
 18 you to X minutes of  
 19 additional time, that will be  
 20 in addition to the 40 minutes  
 21 that you haven't used today.  
 22 MR. DROGIN: Right. So  
 23 at the very least, if the  
 24 Court says no, we are  
 25 reconvening for 40 minutes?

1 G. C. ROBINSON  
 2 Is that your understanding,  
 3 or are you going to oppose  
 4 that as well?  
 5 MS. HARWIN: We will  
 6 agree to reconvene for 40  
 7 minutes if the Court allows  
 8 additional time.  
 9 (Continued on next page  
 10 to accommodate jurat.)  
 11  
 12  
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 25

1 G. C. ROBINSON  
 2 MR. DROGIN: That is all  
 3 I was asking.  
 4 MR. BENNETT: Requesting  
 5 a rough transcript.  
 6 MR. DROGIN: Requesting a  
 7 copy of the transcript and a  
 8 rough transcript.  
 9 MS. HARWIN: Requesting a  
 10 copy of the transcript.  
 11  
 12 (Time Noted: 6:11 p.m.)  
 13  
 14 GRAHAM CHASE ROBINSON  
 15  
 16 Subscribed and sworn to  
 17 before me this day of  
 18 2021.  
 19  
 20  
 21 Notary Public  
 22  
 23  
 24  
 25

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EXHIBITS

ROBINSON	DESCRIPTION	PAGE
A	a three-page PDF document that was filed in the New York State Action as document number 10	156
B	a seven-page PDF starting with Bates stamped Robinson 5114	163
C	a 20-page PDF, file name P13908	180
D	a Tom Harvey letter, from July 11, 2019	270

1 CERTIFICATE  
 2  
 3 I, PAIGE HAYDEN, hereby certify that the  
 4 Examination Before Trial of GRAHAM CHASE ROBINSON was  
 5 held before me on the 20th day of December, 2021; that  
 6 said witness was duly sworn before the commencement of  
 7 her testimony; that the testimony was taken  
 8 stenographically by myself and then transcribed by  
 9 myself; that the party was represented by counsel as  
 10 appears herein;  
 11 That the within transcript is a true record of  
 12 the Examination Before Trial of said witness;  
 13 That I am not connected by blood or marriage  
 14 to any of the parties; that I am not interested directly  
 15 or indirectly in the outcome of this matter; that I am  
 16 not in the employ of any of the counsel.  
 17 IN WITNESS WHEREOF, I have hereunto set my  
 18 hand this 20th day of December, 2021.  
 19  
 20  
 21  
 22  
 23  
 24  
 25

PAIGE HAYDEN

ERRATA SHEET

PAGE	LINE (S)	CHANGE	REASON

GRAHAM CHASE ROBINSON

SUBSCRIBED AND SWORN TO BEFORE ME

THIS \_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_.

(NOTARY PUBLIC)

MY COMMISSION EXPIRES: